

PHA Name : New Smyrna Beach

PHA Code : FL022

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 4/1/2022

PHA Program Type: Combined

MTW Cohort Number: MTW Flexibility for Smaller PHAs

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The New Smyrna Beach Housing Authority (NSBHA), established in 1950, is located in New Smyrna Beach, Florida. The NSBHA 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 NSBHA is committed to providing quality, affordable housing, that enhances the lives of its residents and promotes their independence. The overall vision for the NSBHA's Moving to Work (MTW) program is to create a quality housing model that transforms families from poverty to prosperity while sustaining financial viability of the authority through the implementation of efficient business processes. Additionally, the NSBHA will develop and implement a comprehensive, integrated, and coordinated service delivery archetype that combines housing, coaching and mentoring, life skills and empowerment, education, and workforce development. Lastly, the NSBHA will reposition its public housing portfolio through demolition and new construction, which will include implementing initiatives that will provide families with more housing choices, employment, and educational centers.

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).

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| 1. Tenant Rent Policies | |
| e. Minimum Rent (PH) | Plan to Implement in the Submission Year |
| f. Minimum Rent (HCV) | Plan to Implement in the Submission Year |
| 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 |
| r. Elimination of Deduction(s) (PH) | Plan to Implement in the Submission Year |
| s. Elimination of Deduction(s) (HCV) | Plan to Implement in the Submission Year |
| v. Alternative Income Inclusions/Exclusions (PH) | Plan to Implement in the Submission Year |
| w. Alternative Income Inclusions/Exclusions (HCV) | Plan to Implement in the Submission Year |
| 2. Payment Standards and Rent Reasonableness | |
| b. Payment Standards- Fair Market Rents (HCV) | Plan to Implement in the Submission Year |
| 3. Reexaminations | |
| 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) | |
| d. Alternative Inspection Schedule (HCV) | Plan to Implement in the Submission Year |
| 6. Short-Term Assistance | |
| 7. Term-Limited Assistance | |
| 8. Increase Elderly Age (PH & HCV) | |
| 9. Project-Based Voucher Program Flexibilities | |
| b. Increase PBV Project Cap (HCV) | Plan to Implement in the Submission Year |
| 10. Family Self-Sufficiency Program with MTW Flexibility | |
| 11. MTW Self-Sufficiency Program | |
| 12. Work Requirement | |
| 13. Use of Public Housing as an Incentive for Economic Progress (PH) | |
| 14. Moving on Policy | |
| 15. Acquisition without Prior HUD Approval (PH) | |
| 16. Deconcentration of Poverty in Public Housing Policy (PH) | |
| 17. Local, Non-Traditional Activities | |

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

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| 1.e. - Minimum Rent (PH) |
| The NSBHA will implement a minimum rent for eligible non-elderly and non-disabled households to encourage self-sufficiency. The minimum rent for these households will increase from \$50 to \$130 per month. |
| This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency |
| This MTW activity serves the following statutory objectives: Increased revenue Decreased expenditures |
| An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households |
| This MTW activity applies to: |

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| New admissions and currently assisted households |
| An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types |
| This MTW activity requires a Hardship Policy. The Hardship Policy is attached. |
| Attached Hardship policy applies to: 1.r. - Elimination of Deduction(s) (PH) 1.s. - Elimination of Deduction(s) (HCV) 2.b. - Payment Standards- Fair Market Rents (HCV) 3.a. - Alternative Reexamination Schedule for Households (PH) 3.b. - Alternative Reexamination Schedule for Households (HCV)} |
| No hardship were requested in the most recent fiscal year. |
| In the prior year, under this activity, New Smyrna Beach MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending. |
| This MTW activity requires an Impact Analysis. The Impact Analysis is attached. |
| minimum rent or minimum Total Tenant Payment (TTP) - \$130 |

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| 1.f. - Minimum Rent (HCV) |
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| The MTW activity applies to all tenant-based units |
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| minimum rent or minimum Total Tenant Payment (TTP) - \$130 |

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| 1.i. - Alternative Utility Allowance (PH) |
| The NSBHA 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. |
| This MTW activity serves the following statutory objectives: Cost effectiveness |
| This MTW activity serves the following statutory objectives: |

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| Increased revenue Decreased expenditures |
| An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households |
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| In the prior year, under this activity, New Smyrna Beach MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending. |
| 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 NSBHA will make a standardized utility allowance by averaging every utility type and then adding those averages together based on bedroom size and dwelling type (multi-family and single-family). 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 NSBHA will have two standard utility allowance schedules based on bedroom size and dwelling type for HCV and one standard utility allowance schedule based on bedroom size for public housing. This new practice will reduce the administrative burden on the NSBHA's staff during recertifications. |

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| 1.j. - Alternative Utility Allowance (HCV) |
| The NSBHA will streamline its recertifications by employing a standard utility allowance for its HCV 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. |
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1.m. - Utility Reimbursements (PH)

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

The NSBHA disburses \$2,127 in monthly utility reimbursements to approximately 19 public housing households, which equates to an average monthly utility reimbursement of \$112 per household. The yearly average reimbursement is \$1,343 per household. There are approximately 19 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 \$130 regardless of their utility allowance. The NSBHA will realize a minimum of \$2,127 in monthly cost savings and anticipates at least a \$25,524 cost savings during the first year in which this activity is implemented.

This MTW activity serves the following statutory objectives:
Cost effectiveness

This MTW activity serves the following statutory objectives:
Increased revenue
Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:
New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).
The MTW activity applies to all family types

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, New Smyrna Beach MTW agency
Received 0 hardship requests
Approved hardship requests
Denied hardship requests
There is\are hardship requests pending.

1.n. - Utility Reimbursements (HCV)

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

The NSBHA disburses \$2,127 in monthly utility reimbursements to approximately 19 HCV households, which equates to an average monthly utility reimbursement of \$112 per household. The yearly average reimbursement is \$1,343 per household. There are approximately 19 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 \$130 regardless of their utility allowance. The NSBHA will realize a minimum of \$2,127 in monthly cost savings and anticipates at least a \$25,524 cost savings during the first year in which this activity is implemented.

This MTW activity serves the following statutory objectives:
Cost effectiveness

This MTW activity serves the following statutory objectives:
Increased revenue
Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:
New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).
The MTW activity applies to all family types

The MTW activity applies to all tenant-based units

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, New Smyrna Beach MTW agency
Received 0 hardship requests
Approved hardship requests

Denied hardship requests
There is\are hardship requests pending.

1.r. - Elimination of Deduction(s) (PH)

The NSBHA will streamline its recertifications by eliminating deductions and the standard of rent based on adjusted income for all able-bodied public housing households. The total tenant payment (TTP) will be calculated based on gross income, and eligible households will pay at least the minimum rent of \$130. This waiver will increase the household rent, which will in turn increase revenue for the NSBHA. These realized funds will be used to increase supportive services for families.

This MTW activity serves the following statutory objectives:
Cost effectiveness

This MTW activity serves the following statutory objectives:
Increased revenue
Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:
New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).
The MTW activity applies only to selected family types

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

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, New Smyrna Beach MTW agency
Received 0 hardship requests
Approved hardship requests
Denied hardship requests
There is\are hardship requests pending.

This MTW activity requires an Impact Analysis. The Impact Analysis is attached.

Following deduction(s) will be eliminated, modified, or added.
Dependent allowance
Unreimbursed childcare costs
Other
Disability assistance (non-head, spouse, or co-head)

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

The NSBHA will streamline its recertifications by eliminating deductions and the standard of rent based on adjusted income for all able-bodied HCV households. The total tenant payment (TTP) will be calculated based on gross income, and eligible households will pay at least the minimum rent of \$130. This waiver will increase the household rental portion, which will in turn decrease HAP for the NSBHA. These realized funds will be used to increase supportive services for families.

This MTW activity serves the following statutory objectives:
Cost effectiveness

This MTW activity serves the following statutory objectives:
Increased revenue
Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:
New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).
The MTW activity applies only to selected family types

The MTW activity applies to all tenant-based units

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| This MTW activity requires a Hardship Policy. The Hardship Policy is attached. |
| No hardship were requested in the most recent fiscal year. |
| In the prior year, under this activity, New Smyrna Beach MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending. |
| This MTW activity requires an Impact Analysis. The Impact Analysis is attached. |
| Following deduction(s) will be eliminated, modified, or added. Dependent allowance Unreimbursed childcare costs Other (please explain) Disability assistance (non-head, spouse, or co-head) |

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| 1.v. - Alternative Income Inclusions/Exclusions (PH) |
| The NSBHA will eliminate the Earned Income Disregard. This will increase operational efficiencies by reducing the time it takes to administratively process the EID. Currently, the EID allows individuals who go from not working in the previous 12 months, to working, to gradually phase in the income counted toward their rental calculation over a period of 2 years. The EID is an opportunity for clients that gain earned income, that did not previously have earned income to experience the benefit of increased income without that income increase being utilized for rent immediately; however, due to cumbersome regulations, the cost to continue offering this exclusion far outweigh the benefits. Families will benefit from an increase in income without an immediate increase in rent due to triennial recertifications. |
| This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency |
| This MTW activity serves the following statutory objectives: Decreased expenditures |
| An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households |
| This MTW activity applies to: New admissions and currently assisted households |
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| No hardship were requested in the most recent fiscal year. |
| In the prior year, under this activity, New Smyrna Beach MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending. |
| Following inclusions or exclusions will be eliminated, modified, or added. The NSBHA will eliminate the Earned Income Disregard. |

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| 1.w. - Alternative Income Inclusions/Exclusions (HCV) |
| The NSBHA will eliminate the Earned Income Disregard. This will increase operational efficiencies by reducing the time it takes to administratively process the EID. Currently, the EID allows individuals who go from not working in the previous 12 months, to working, to gradually phase in the income counted toward their rental calculation over a period of 2 years. The EID is an opportunity for clients that gain earned income, that did not previously have earned income to experience the benefit of increased income without that income increase being utilized for rent immediately; however, due to cumbersome regulations, the cost to continue offering this exclusion far outweigh the benefits. Families will benefit from an increase in income without an immediate increase in rent due to triennial recertifications. |

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| <p>This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency</p> |
| <p>This MTW activity serves the following statutory objectives: Decreased expenditures</p> |
| <p>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households</p> |
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| <p>The MTW activity applies to all tenant-based units</p> |
| <p>No hardship were requested in the most recent fiscal year.</p> |
| <p>In the prior year, under this activity, New Smyrna Beach MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.</p> |
| <p>Following inclusions or exclusions will be eliminated, modified, or added. The NSBHA will eliminate the Earned Income Disregard.</p> |

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| <p>2.b. - Payment Standards- Fair Market Rents (HCV)</p> |
| <p>The NSBHA 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 NSBHA households can live. This activity is a remedy to this concern.</p> |
| <p>The current NSBHA payment standard is 110% of the FMR. A payment standard of 120% of FMR will increase the payment standard by an average of \$118 for all bedroom sizes.</p> |
| <p>This MTW activity serves the following statutory objectives: Housing choice</p> |
| <p>This MTW activity serves the following statutory objectives: Decreased revenue</p> |
| <p>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households</p> |
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| <p>The MTW activity applies to all tenant-based units</p> |
| <p>This MTW activity requires a Hardship Policy. The Hardship Policy is attached.</p> |
| <p>No hardship were requested in the most recent fiscal year.</p> |
| <p>In the prior year, under this activity, New Smyrna Beach MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.</p> |
| <p>This MTW activity requires an Impact Analysis. The Impact Analysis is attached.</p> |
| <p>Following will explain the payment standards by FMR: The current NSBHA payment standard is 110% of the FMR. A payment standard of 120% of FMR will increase the payment standard by an average of \$118 for all bedroom sizes.</p> |
| <p>Bedroom Size /Current FMR/Current PS/120% FMR-PS 0 \$754/\$829/\$905 1 \$931/\$1,024/\$1,117 2 \$1,135/\$1,249/\$1,362</p> |

3 \$1,505/\$1,655/\$1,806
4 \$1,580/\$1,738/\$1,896

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

The NSBHA will decrease the frequency of tenant reexaminations from annual to triennial for all public housing 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 NSBHA 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 will not count against the limit on voluntary interim recertifications.

This MTW activity serves the following statutory objectives:
Cost effectiveness
Self-sufficiency

This MTW activity serves the following statutory objectives:
Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:
New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).
The MTW activity applies to all family types

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In the prior year, under this activity, New Smyrna Beach MTW agency
Received 0 hardship requests
Approved hardship requests
Denied hardship requests
There is\are hardship requests pending.

This MTW activity requires an Impact Analysis. The Impact Analysis is attached.

Recertification Schedule is Once every three years

Household may request 1 interim recertifications per year.

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)

The NSBHA will decrease the frequency of tenant reexaminations from annual to triennial 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 NSBHA 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 or landlord rent increases will not count against the limit on voluntary interim recertifications.

This MTW activity serves the following statutory objectives:
Cost effectiveness
Self-sufficiency

This MTW activity serves the following statutory objectives:
Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households

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| Recertification Schedule is Once every three years |
| Household may request 1 interim recertifications per year. |
| Required interim recertifications for household composition changes will not count against the limit on voluntary interim recertifications. |

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| 3.c. - Self-Certification of Assets (PH) |
| The asset self-certification ceiling will be increased from \$5,000 to \$50,000. This will lessen the regulatory responsibilities of the NSBHA. |
| This MTW activity serves the following statutory objectives: Cost effectiveness |
| This MTW activity serves the following statutory objectives: Decreased expenditures |
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| The dollar threshold for the self-certification of assets is \$50,000. |

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| 3.d. - Self-Certification of Assets (HCV) |
| The asset self-certification ceiling will be increased from \$5,000 to \$50,000. This will lessen the regulatory responsibilities of the NSBHA. |
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| The dollar threshold for the self-certification of assets is \$50,000. |

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| 5.d. - Alternative Inspection Schedule (HCV) |
| The NSBHA will establish a triennial inspection schedule for all HCV units in accordance with HQS inspection standards as outlined in 24 CFR 982.401. HCV participants may request an interim inspection, and HUD may conduct or direct the NSBHA to perform an inspection at any time for health and safety or accessibility purposes. |
| This MTW activity serves the following statutory objectives: Cost effectiveness |
| This MTW activity serves the following statutory objectives: Increased revenue Decreased expenditures |
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| 9.b. - Increase PBV Project Cap (HCV) |
| The NSBHA will increase the cap on the percentage of project-based vouchers that can be project based in a building or project from 25% to 100%. This will allow the NSBHA to offer more housing choices to families. NSBHA is subject to Notice PIH 2013-27 where applicable, or its successor. |
| This MTW activity serves the following statutory objectives: Cost effectiveness Housing choice |
| This MTW activity serves the following statutory objectives: Increased revenue |
| An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households |
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No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, New Smyrna Beach MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

| | |
|------------|---|
| D. | Safe Harbor Waivers. |
| D.1 | Safe Harbor Waivers seeking HUD Approval: No Safe Harbor Waivers are being requested. |

| | |
|------------|--|
| E. | Agency-Specific Waiver(s). |
| E.1 | Agency-Specific Waiver(s) for HUD Approval: The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, Agency-Specific Waivers may be requested. No Agency-Specific Waivers are being requested. |
| E.2 | Agency-Specific Waiver(s) for which HUD Approval has been Received: MTW Agency does not have approved Agency-Specific Waivers |

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

| Federal Fiscal Year (FFY) | Total Operating Subsidy Authorized Amount | How Much PHA Disbursed by the 9/30 Reporting Period | Remaining Not Yet Disbursed | Deadline |
|----------------------------------|--|--|------------------------------------|-----------------|
| 2023 | \$426,110 | \$0 | \$426,110 | 2031-09-30 |

| | | |
|------------|---|---|
| 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 | |
| | 49%-30% Area Median Income | |
| | Below 30% Area Median Income | |
| | Total Local, Non-Traditional Households | 0 |

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

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

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

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

| PROPERTY NAME/ ADDRESS | 0/1 BR | 2 BR | 3 BR | 4 BR | 5 BR | 6+ BR | TOTAL UNITS | POPULATION TYPE* | if 'Population Type' is Other | # of Section 504 Accessible (Mobility)** | # of Section 504 Accessible (Hearing/ Vision) | Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year? | What was the Total Amount of MTW Funds Invested into the Property? |
|------------------------|--------|------|------|------|------|-------|-------------|------------------|-------------------------------|--|---|---|--|
|------------------------|--------|------|------|------|------|-------|-------------|------------------|-------------------------------|--|---|---|--|

| | |
|---|--|
| G.4 | Comparable Mix (by Family Size) – Local, Non-Traditional. |
| To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table. | |

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

| H. | Public Comment |
|----|---|
| | 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. |
| | No additional public hearing was held for an Agency-Specific Waiver and/or Safe Harbor waiver |

| 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 (04/01/2022), 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.

The Housing Authority of the City of New Smyrna Beach

FL022

MTW PHA NAME

MTW PHA NUMBER/HA CODE

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

Rosemary Walker

Board Chair

NAME OF AUTHORIZED OFFICIAL

TITLE

Rosemary Walker
SIGNATURE

4/26/2022

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.*

RESOLUTION NO.: 2022-11

APPROVAL AND AUTHORIZATION TO SUBMIT THE NEW SMYRNA BEACH HOUSING AUTHORITY'S FY2023 MOVING TO WORK SUPPLEMENT TO THE ANNUAL PLAN COVERING THE PERIOD APRIL 1, 2022, THROUGH MARCH 31, 2023, TO THE UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

WHEREAS, the New Smyrna Beach Housing Authority's mission is to provide quality, affordable housing, that enhances the lives of their residents and promotes their independence, and

WHEREAS, the Moving to Work (MTW) demonstration program supports the New Smyrna Beach Housing Authority mission and the New Smyrna Beach Housing Authority has been designated as a MTW agency, and

WHEREAS, the New Smyrna Beach Housing Authority has prepared its FY2023 MTW Supplement to the Annual Plan covering the period April 1, 2022, through March 31, 2023, and

WHEREAS, the New Smyrna Beach Housing Authority updated its Housing Choice Voucher Administrative Plan and Public Housing Admissions and Continued Occupancy Policy (ACOP) to reflect policy changes made in the FY2023 MTW Supplement, and

WHEREAS, the MTW Supplement, Administrative Plan, and ACOP were available for public comment for at least forty-five (45) days, and there were no less than fifteen (15) days between the public hearing and the approval of the MTW Supplement by the Board of Commissioners in order to incorporate any public comments into the MTW Supplement, and

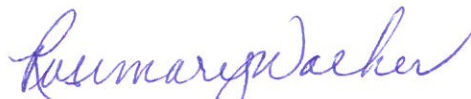
WHEREAS, the New Smyrna Beach Housing Authority received no public comments about the program design, and

WHEREAS, the New Smyrna Beach Housing Authority FY2023 MTW Supplement to the Annual Plan is incorporated by reference into this Resolution.

NOW, THEREFORE, BE IT RESOLVED that the Board of Commissioners of the New Smyrna Beach Housing Authority approves and authorizes the Executive Director to submit the New Smyrna Beach Housing Authority's FY2023 MTW Supplement to the Annual Plan to the U. S. Department of Housing and Urban Development and authorizes the Executive Director to execute all necessary agreements and to make changes that are not substantial.



**TERESA POPE
EXECUTIVE DIRECTOR**



**ROSEMARY WALKER
CHAIRMAN**

**APRIL 26, 2022
DATE**



NEW SMYRNA BEACH HOUSING AUTHORITY HARDSHIP POLICY

The NSBHA 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 NSBHA to be appropriate.

Process for Agency Review and Determination

When a client requests a hardship exemption from an MTW activity, the NSBHA 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 NSBHA 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 NSBHA will continue providing an exemption from the MTW activity at a reasonable level for up to 90 days. After that time, the NSBHA will reinstate the MTW activity from the beginning of the suspension. The NSBHA will offer the family a reasonable repayment agreement, on terms and conditions established by the NSBHA 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 NSBHA will continue providing an exemption from the MTW activity at a reasonable level for a specified duration determined by the NSBHA. After that time, the NSBHA will reinstate the MTW activity from the beginning of the suspension. The NSBHA will offer the family a reasonable repayment agreement on terms and conditions established by the NSBHA 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 NSBHA 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 NSBHA will address persons with handicaps requesting a reasonable accommodation under 24 CFR part 8 through the NSBHA's Reasonable Accommodations Policy and procedures.

Record Keeping

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

FY23 NSBHA Impact Analysis Activity 7 **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 NSBHA will decrease the frequency of tenant reexaminations from annual to triennial for all of its public housing and HCV households, including Veterans Affairs Supportive Housing (VASH) voucher holders. The NSBHA 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 NSBHA's households to have a more consistent 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.
- 7. Impact on the agency's ability to meet the MTW statutory requirements**
The NSBHA 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 NSBHA 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 NSBHA Impact Analysis Activity 6
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)**
The NSBHA will raise the payment standard to 120% of the Fair Market Rents (FMR). It is anticipated that this activity will increase the NSBHA's federal expenditures in terms of housing assistance payments (HAP). The average HAP is projected to increase by \$118 per family, per month. 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 NSBHA 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 NSBHA 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 NSBHA 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.

FY23 NSBHA Impact Analysis Activity 3
Elimination of Deductions

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 NSBHA is eliminating standardized income deductions for all non-elderly, non-disabled families in the public housing and HCV programs. In addition, the NSBHA is increasing the minimum rent from \$50 to \$130 and implementing a standard utility allowance based on bedroom size and dwelling type. Eliminating \$16,835 of annual income deductions will be evident through an increase in revenue and a decrease in HAP for the NSBHA.

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 waiver will be employed in tandem with a minimum rent. Total tenant payment (TTP) will be calculated based on gross rent, and families will pay at least the minimum rent of \$130. At present, this waiver will only affect five families, who all receive a childcare deduction. These families will see an increase in their rental amount/rental portion; however, many able-bodied families may see an increase in their rental amount/rental portion due to the introduction of the minimum rent.

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

This waiver 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 waiver 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 waiver will not affect the agency's current occupancy level in public housing or the 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 waiver will increase the cost effectiveness in the public housing program. The amount of tenant rent collected will increase, and these funds will help fund self-sufficiency activities.

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

This waiver will enable the NSBHA to meet both the statutory objectives of Cost Effectiveness.

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

The NSBHA does not anticipate the number of hardship requests increasing due to the implementation of this waiver.

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

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

FY23 NSBHA Impact Analysis Activity 1

Minimum Rent

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

Public Housing

There are currently nine (9) able-bodied families in the public housing program whose income-based rent is less than the minimum rent of \$50. It is anticipated that the increase in the minimum rent to \$130 will increase the amount of monthly tenant rent collected by at least a total of \$1,004 or \$12,048 annually.

Housing Choice Voucher

There are currently approximately 26 able-bodied families in the voucher program whose income-based rent is at or less than the minimum rent of \$50. It is anticipated that the increase in the minimum rent to \$130 will decrease the amount of monthly housing assistance payments (HAP) by at least a total of \$3,008 or \$36,096 annually.

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)

Public Housing

Program rules dictate a family must pay the higher of the tenant-based rent or the minimum rent. Currently there are nine public housing families that pay less than the minimum rent of \$50.

It is anticipated the implementation of an increased minimum rent will raise the tenant rent paid by affected families in the public housing program by an average of 1,344%.

Housing Choice Voucher

Program rules dictate a family must pay the higher of 30% of adjusted income or 10% of gross income and never less than the minimum rent. Currently there are 26 HCV families that pay the minimum rent of \$50 or less.

It is anticipated the implementation of an increased minimum rent will raise the tenant rent paid by affected families in the HCV Program by an average of 826%.

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

This waiver 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 waiver 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 waiver will not affect the agency's current occupancy level in public housing 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 waiver will increase the cost effectiveness of both the Public Housing and HVC Programs. The amount of tenant rent collected in the public housing program will increase and the amount of HAP paid under the HCV program will decrease. These funds will be available to fund self-sufficiency activities, preserve existing affordable housing assets, and acquire new affordable housing assets.

MTW Statutory Objective – Self Sufficiency

This waiver will provide incentives for families to work, decrease the incentive to voluntarily make decisions that would reduce household income, and reduce client dependence on the subsidy safety net.

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

This waiver will enable NSBHA to meet both the statutory objectives of Cost Effectiveness and Self-Sufficiency.

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

It is anticipated that the rate of hardship requests will increase regarding minimum rent waivers for both the public housing and HCV Programs, and it is expected that the majority of initial minimum rent waiver requests will be approved.

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

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