

PHA Name : Newnan

PHA Code : GA095

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2022

PHA Program Type: Combined

MTW Cohort Number: MTW Flexibility for Smaller PHAs

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The Housing Authority of Newnan (HAN) plans to adopt the following statutory objectives: Reduce cost and achieve greater cost-effectiveness in federal expenditures; give incentives to families with children where the head of household is working; is seeking work; or are preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and increase housing choices for eligible low-income families. HAN believes that PH and HVC should be a steppingstone to self-sufficiency; clients who come in through the PH and HCV programs can use their housing assistance as a tool to become self-sufficient. HAN's decision to participate in the MTW Demonstration is due to our commitment to improve resident outcomes, increase program cost-effectiveness, and through the development of a rent reform and incentive program. The proposed program will encourage and support program participants' self-sufficiency, while increasing landlord involvement; and reducing administrative burden and costs. In addition, HAN plans to upgrade its existing units, purchase or construct additional units, and provide funds to support additional MTW HCV.

1. Administrative Efficiency and Cost Effectiveness MTW flexibilities will allow HAN to make simple changes to eliminate requirements that cause confusion amongst clients and increase the workload for HAN staff. Using the MTW waiver ability, HAN will eliminate utility reimbursement calculation for MTW PH and HCV participants. These calculations are burdensome to HAN staff because of the time and coordination efforts needed to process these deductions. HCV clients will know the exact amount of their rental assistance before they start looking for suitable housing. To save money and increase housing choices, HAN plans to apply for block grant PH and HCV funds. This will also help to improve program efficiency and effectiveness.

The HAN will increase the minimum rent for all clients during our first year of implementation. Our current minimum rent is \$50.00. All clients will have a minimum rent of \$130. This MTW activity will be effective July 1, 2022. Rent Increases will be adjusted during the household annual recertification. This initiative will promote self-sufficiency by encouraging heads-of household to work, while raising much-needed rental revenue. This revenue can be put back into the agency-allowing HAN to complete long-deferred maintenance projects and fund MTW projects. To ensure this initiative target residents who can work, elderly and disabled families, as well as full-time students will be exempt. Hardship requests will be processed per HAN'S MTW Rent Reform Hardship Policy.

HAN plans to implement Biennial Recertification for family units and Triennial Recertification for elderly/disabled households for all PH and HCV clients. HAN will allow an interim recertification annually. Elderly and disabled households are exempt from this provision and can complete an interim recertification at any time. Clients that believe they qualify for a hardship may request an interim recertification. HAN will allow requested hardship interim recertifications between biennial recertifications. MTW clients are not required to report increases/decreases in income between biennial recertifications; however, they must report all other household composition changes.

HAN will establish a cap in the childcare deduction. This activity modifies the applicable rules and regulations necessary to limit the amount of childcare deduction that may be taken by all HAN clients. The activity allows HAN to place a cap on childcare deductions to match with the Georgia Childcare and Parent Services (GA CAPS) reimbursement amounts. Childcare costs that exceed GA CAPS reimbursement amounts are reduced to categorical maximum amounts filtered by age. Hardship requests are addressed on a case-by-case basis in accordance with the Hardship Policy. Families continue to furnish proof of their out-of-pocket childcare expenses and HAN staff will verify the provided costs are in-line with GA CAPS based on the child's age and service provider.

2. Self Sufficiency Initiatives to encourage unemployed residents to gain employment, HAN will institute a minimum rent of \$130 for all clients. HAN will eliminate interim rent adjustments to decrease the administrative burden of having to calculate recurring income changes between recertifications. In addition, will also allow residents to save money from increased employment earnings.

3. Increasing Housing Choices HAN will offer landlords a one-time monetary bonus for leasing to HCV clients and will also offer reimbursement for approved damages up to a pre-determined amount. HCV will conduct widespread landlord outreach to educate potential landlords on the benefits of renting to HCV clients. HAN will also consider awarding project-based vouchers (PBV) as needed to support the construction of additional affordable housing units. To continue advancing housing choices for clients, HAN will invest in landlord recruitment; add incentives, client rental supports, and project-based housing flexibility. On the client's side, HAN case managers will assist with housing search, rental options specific to the client's needs, and assist with obtaining supportive services.

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	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Plan to Implement in the Submission Year
f. Minimum Rent (HCV)	Plan to Implement in the Submission Year
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Plan to Implement in the Submission Year
n. Utility Reimbursements (HCV)	Plan to Implement in the Submission Year
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
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
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
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)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Not Currently Implemented
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Not Currently Implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Plan to Implement in the Submission Year
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
6. Short-Term Assistance	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	
Increase Elderly Age (PH & HCV)	Not Currently Implemented

9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Not Currently Implemented
b. Increase PBV Project Cap (HCV)	Not Currently Implemented
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
10. Family Self-Sufficiency Program with MTW Flexibility	
a.PH Waive Operating a Required FSS Program (PH)	Not Currently Implemented
a.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b.PH Alternative Structure for Establishing Program Coordinating Committee (PH)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented
c.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.PH Modify or Eliminate the Contract of Participation (PH)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
11. MTW Self-Sufficiency Program	
a.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
12. Work Requirement	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
14. Moving on Policy	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
15. Acquisition without Prior HUD Approval (PH)	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
16. Deconcentration of Poverty in Public Housing Policy (PH)	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
17. Local, Non-Traditional Activities	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented
c. Housing Development Programs	Not Currently Implemented

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

1.e. - Minimum Rent (PH)
<p>The HAN will increase the minimum rent for all clients (New Admission and Currently Assisted) during our first year of implementation. Our current minimum rent is \$50.00. All clients will have a minimum rent of \$130. This MTW activity will be effective July 1, 2022. Rent Increases will be adjusted during the household annual recertification. This initiative will promote self-sufficiency by encouraging heads-of household to work, while also promoting cost effectiveness by raising much-needed rental revenue. This revenue can be put back into the agency-allowing HAN to complete long-deferred maintenance projects and fund MTW projects. To ensure this initiative target residents who can work, elderly and disabled families, as well as full-time students will be exempt. Hardship requests will be processed per HAN'S MTW Rent Reform Hardship Policy.</p> <p>Safe Harbors:</p> <ul style="list-style-type: none"> i. Minimum rent must not exceed \$130 per month. ii. To ensure this initiative target residents who can work, elderly and disabled families, as well as full-time students will be exempt. iii. HAN will conduct an impact analysis for this activity. iv. Hardship requests will be processed per HAN'S MTW Rent Reform Hardship Policy.
<p>This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency</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>
<p>This MTW activity applies to: New admissions and currently assisted households</p>
<p>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</p>
<p>N/A</p>
<p>This MTW activity requires a Hardship Policy. The Hardship Policy is attached.</p>
<p>Attached Hardship policy applies to: 1.e. - Minimum Rent (PH) 1.f. - Minimum Rent (HCV) 1.r. - Elimination of Deduction(s) (PH) 1.s. - Elimination of Deduction(s) (HCV) 3.a. - Alternative Reexamination Schedule for Households (PH) 3.b. - Alternative Reexamination Schedule for Households (HCV)}</p>
<p>No hardship were requested in the most recent fiscal year.</p>
<p>In the prior year, under this activity, Newnan 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>minimum rent or minimum Total Tenant Payment (TTP) - \$130</p>

1.f. - Minimum Rent (HCV)
<p>The HAN will increase the minimum rent for all clients (New Admission and Currently Assisted) during our first year of implementation. Our current minimum rent is \$50.00. All clients will have a minimum rent of \$130. This MTW activity will be effective July 1, 2022. Rent Increases will be adjusted during the household annual recertification. This initiative will promote self-sufficiency by encouraging heads-of household to work, while also promoting cost effectiveness by raising much-needed rental revenue. This revenue can be put back into the agency-allowing HAN to complete long-deferred maintenance projects and fund MTW projects. To ensure this initiative target residents who can work, elderly and disabled families, as well as full-time students will be exempt. Hardship requests will be processed per HAN'S MTW Rent Reform Hardship Policy.</p>

<p>Safe Harbors:</p> <ul style="list-style-type: none"> i. Minimum rent must not exceed \$130 per month. ii. To ensure this initiative target residents who can work, elderly and disabled families, as well as full-time students will be exempt. iii. HAN will conduct an impact analysis for this activity. iv. Hardship requests will be processed per HAN'S MTW Rent Reform Hardship Policy.
<p>This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency</p>
<p>This MTW activity serves the following statutory objectives: Neutral (no cost implications)</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>
<p>This MTW activity applies to: New admissions and currently assisted households</p>
<p>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</p>
<p>The MTW activity applies to all tenant-based units</p>
<p>N/A</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, Newnan 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>minimum rent or minimum Total Tenant Payment (TTP) - \$130</p>

<p>1.m. - Utility Reimbursements (PH)</p>
<p>HAN will eliminate Utility Reimbursements payments for all clients (New Admission and Currently Assisted) at all locations. To ensure this initiative target residents who can work, elderly and disabled families, as well as full-time students will be exempt.</p>
<p>This MTW activity serves the following statutory objectives: Cost effectiveness</p>
<p>This MTW activity serves the following statutory objectives: Neutral (no cost implications)</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>
<p>This MTW activity applies to: New admissions and currently assisted households</p>
<p>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</p>
<p>N/A</p>
<p>No hardship were requested in the most recent fiscal year.</p>
<p>In the prior year, under this activity, Newnan MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.</p>

1.n. - Utility Reimbursements (HCV)
HAN will eliminate Utility Reimbursements payments for all clients (New Admission and Currently Assisted) and all locations. To ensure this initiative target residents who can work, elderly and disabled families, as well as full-time students will be exempt.
This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency
This MTW activity serves the following statutory objectives: Neutral (no cost implications)
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
N/A
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Newnan 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)
HAN will establish a cap in the childcare deduction. This activity modifies the applicable rules and regulations necessary to limit the amount of childcare deduction that may be taken by all HAN clients. The activity allows HAN to place a cap on childcare deductions to match with the Georgia Childcare and Parent Services (GA CAPS) reimbursement amounts. Childcare deductions will not exceed GA CAPS reimbursement amounts and are reduced to categorical maximum amounts filtered by age. Hardship requests are addressed on a case-by-case basis in accordance with the Hardship Policy. Families continue to furnish proof of their out-of-pocket childcare expenses and HAN staff will simply verify the provided childcare costs are in-line with GA CAPS based on the child's age and service provider.
Safe Harbors: i. HAN will conduct an impact analysis for this activity. ii. To ensure this initiative target residents who can work, elderly and disabled families, as well as full-time students will be exempt. iii. Hardship requests will be processed per HAN'S MTW Rent Reform Hardship Policy.
HAN's administrative staff will utilize the Georgia Childcare and Parent Services (GA CAPS) reimbursements rates as a reference guide to determined childcare deduction cap/limits. The reference guide is located at the following: https://caps.decal.ga.gov/assets/downloads/CAPS/AppendixC-CAPS Reimbursement Rates.pdf
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Neutral (no cost implications)
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, Newnan 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. Other Modified Childcare Deductions.

1.s. - Elimination of Deduction(s) (HCV)
HAN will establish a cap in the childcare deduction. This activity modifies the applicable rules and regulations necessary to limit the amount of childcare deduction that may be taken by all HAN clients (New Admission and Currently Assisted) at all locations. The activity allows HAN to place a cap on childcare deductions to match with the Georgia Childcare and Parent Services (GA CAPS) reimbursement amounts. Childcare deductions will not exceed GA CAPS reimbursement amounts and are reduced to categorical maximum amounts filtered by age. Hardship requests are addressed on a case-by-case basis in accordance with the Hardship Policy. Families continue to furnish proof of their out-of-pocket childcare expenses and HAN staff will simply verify the provided childcare costs are in-line with GA CAPS based on the child's age and service provider. To ensure this initiative target residents who can work, elderly and disabled families will be exempt.
Safe Harbors:
i. HAN will conduct an impact analysis for this activity.
ii. To ensure this initiative target residents who can work, elderly and disabled families, as well as full-time students will be exempt.
iii. Hardship requests will be processed per HAN'S MTW Rent Reform Hardship Policy.
HAN's administrative staff will utilize the Georgia Childcare and Parent Services (GA CAPS) reimbursements rates as a reference guide to determined childcare deduction cap/limits. The reference guide is located at the following: https://caps.decal.ga.gov/assets/downloads/CAPS/AppendixC-CAPS Reimbursement Rates.pdf
This MTW activity serves the following statutory objectives: Neutral (no cost implications)
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
N/A
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, Newnan 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. Other (please explain) Modified Childcare Deductions

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

HAN plans to implement Biennial Recertification for family units and Triennial Recertification for elderly/disabled households for all PH and HCV clients (New Admission and Currently Assisted) at all locations. Elderly and disabled households are exempt from this provision and can complete an interim recertification at any time. Clients that believe they qualify for a hardship may request a hardship request and the request will be processed per HAN'S MTW Rent Reform Hardship Policy. HAN will allow hardship interim recertifications between biennial recertifications if the household gross income has decreased 10% or more. MTW clients are not required to report increases in income between biennial recertifications; however, they must report all other changes to the household.

Safe Harbors:

- i. HAN will allow hardship interim recertifications between biennial recertifications
- ii. The agency must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more.
- iii. HAN will conduct an impact analysis.
- iv. Clients that believe they qualify for a hardship may request a hardship request and the request will be processed per HAN'S MTW Rent Reform Hardship Policy.

This MTW activity serves the following statutory objectives:

Cost effectiveness
Self-sufficiency

This MTW activity serves the following statutory objectives:

Increased expenditures
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 to all assisted households

N/A

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, Newnan 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 Other

Biennial Recertification for non-elderly and non disabled families, and Triennial Recertifications for elderly / disabled households.

Household may request 1 interim recertifications per year.

Clients are required to report all other household composition changes.

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

HAN plans to implement Biennial Recertification for family units and Triennial Recertification for elderly/disabled households for all PH and HCV clients (New Admission and Currently Assisted) at all locations. Elderly and disabled households, and full-time students are exempt from this provision and can complete an interim recertification at any time. Clients that believe they qualify for a hardship may request a hardship request and the request will be processed per HAN'S MTW Rent Reform Hardship Policy. HAN will allow hardship interim recertifications between biennial recertifications if the household gross income has decreased 10% or more. MTW clients are not required to report increases/decreases in income between biennial recertifications; however, they must report all other changes to the household.

Safe Harbors:

- i. HAN will allow hardship interim recertifications between biennial recertifications
- ii. The agency must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more.
- iii. HAN will conduct an impact analysis.

iv. Clients that believe they qualify for a hardship may request a hardship request and the request will be processed per HAN'S MTW Rent Reform Hardship Policy.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Neutral (no cost implications)
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 to all assisted households
N/A
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, Newnan 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 Other Biennial Recertification for non elderly and non disabled families and Triennial Recertification for elderly/disabled households.
Household may request 1 interim recertifications per year.
Clients are required to report all other household composition changes.

4.b. - Damage Claims (HCV-Tenant-based Assistance)
HAN's average HAP is \$1,181. HAN will provide a one-time up to \$1,000 claim reimbursement for damages for a specific unit. If the tenant leaves the unit damaged, the amount of damage claims will not exceed \$1000 or lesser of the cost of repairs. The participant's security deposit must first be used to cover damages and the agency before reimbursement is distributed to cover the remaining repairs. The payment must be made to a landlord when the next HAP contract is executed between the owner and HAN. *The owner will be required to submit the claim with documentation be claim can be paid. This activity will retain current landlords within the HCV program as well as attract new landlords who may have reservations of joining the HCV program due to tenant turnover.
Safe Harbors:
i. If the tenant leaves the unit damaged, the amount of damage claims will not exceed \$1000 or lesser of the cost of repairs.
ii. The participant's security deposit must first be used to cover damages and the agency before reimbursement is distributed to cover the remaining repairs.
iii. The payment must be made to a landlord when the next HAP contract is executed between the owner and HAN.
iv. The agency has updated its Administrative Plan to reflect the damage claim policy.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity serves the following statutory objectives: Neutral (no cost implications)
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
N/A
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Newnan MTW agency

Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This policy applies to To all units
The types of units policy applies to:
Maximum payment to the landlord is \$Maximum payment to the landlord is a one-time up to \$1,000 per specific unit not to exceed the lesser of the cost of repairs..
0 payments were issued under this policy y in the most recently completed PHA fiscal year.
\$0 issued under this policy in the most recently completed PHA fiscal year.

4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)
HAN's average HAP is \$1,181. HAN will give all landlords a one-time signing bonus of up to \$1000 for providing new units to the HCV program. A landlord can receive one bonus annually no more than one month of the contract rent. Payments made to the landlord will be \$1000 or no more than one month of contract rent. The payment must be made to the landlord when the HAP contract is executed between the owner and HAN.
Safe Harbors:
i. Payments made to the landlord will be \$1000 or no more than one month of contract rent. ii. The payment must be made to the landlord when the HAP contract is executed between the owner and HAN.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity serves the following statutory objectives: Neutral (no cost implications)
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
N/A
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Newnan MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This policy applies to To all units (Display selected and additional Pop up is complex logic.)
The types of units policy applies to:
Maximum payment to the landlord is \$HAN will give all landlords a one-time signing bonus of up to \$1000 for providing new units to the HCV program. A landlord can receive one bonus annually no more than one month of contract rent. The payment must be made to the landlord when the HAP contract is executed between the owner and HAN..
0 payments were issued under this policy y in the most recently completed PHA fiscal year.
\$0 issued under this policy in the most recently completed PHA fiscal year.

17.b. - Service Provision
HAN will provide housing units for transitional housing to assist the homeless population of Newnan and Coweta County. Newnan will have one transitional housing facility that can house a total of eight occupants, including women and children

<p>ages 0-14. There is an urgent need for transitional housing for families (low-income nonparticipants) in the area. We will partner with local service agencies to provide housing and other supportive services for families (low-income nonparticipants) living in the transitional units.</p>
<p>This MTW activity serves the following statutory objectives: Housing choice</p>
<p>This MTW activity serves the following statutory objectives: Neutral (no cost implications)</p>
<p>No hardship were requested in the most recent fiscal year.</p>
<p>In the prior year, under this activity, Newnan MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.</p>
<p>The following are the types of Services MTW Agency is providing: The following are the types of Services MTW Agency is providing: HAN will provide two housing units for transitional housing to assist the homeless population low -income nonparticipants of Newnan and Coweta County. Partnering with The Housing Authority of Newnan, One Roof Outreach will operate a 24 hour live-in facility, providing food, shelter and counseling for up to one month, for women & children who are experiencing homelessness.</p>
<p>PHA provides services to 0 households in the most recently completed PHA Fiscal Year through this activity.</p>
<p>The MTW activity applies to specific units/properties HAN will provide two units in AMP 3</p>
<p># of persons receiving LNT services only in the most recently completed PHA fiscal year.</p>
<p>No Families are receiving Services only.</p>

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
2022	\$2,085,587	\$1,876,840	\$208,747	2021-12-31

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 did not established a rent reform policy to encourage employment and self-sufficiency HAN do not have any future rent reform activities at this time.	

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

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

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

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

H.	Public Comment
	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 (07/01/2022), 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.

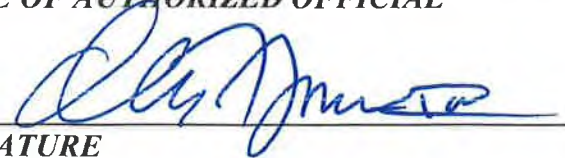
Housing Authority of Newnan
MTW PHA NAME

GA095
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).

Otis Jones III
NAME OF AUTHORIZED OFFICIAL

Chair
TITLE


SIGNATURE

7/6/22
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.

11.10.2021 Moving to Work
Resident Advisory Board Meeting
Minutes and Resident Advisory Board Comments

- The meeting was called to order at 5:06pm.
- There were not enough Resident Advisory Board Members in attendance for a quorum.
- [REDACTED] Keith, Vice President of the Resident Advisory Board was in attendance.
- Staff in attendance: Alfredia Thomas, Director of Resident Services; Khristian Ralls, Moving to Work Coordinator; Bessie Chun, Ross Coordinator.
- The City Council has voted to partner with the Housing Authority of Newnan to renovate all playground on the Housing Authority of Newnan properties.
- [REDACTED] Keith stated a playground is needed on Walt Hall Street. Swings and Picnic Tables under the current pavilions. The basketball goals need to be repaired that were damaged in the tornado storms. Our seniors need more shaded areas or pavilions. Our seniors like to sit outside.
- [REDACTED] Thomas asked [REDACTED] Keith has she reviewed the MTW supplement and does she have any questions.
- [REDACTED] Keith stated she has reviewed the MTW supplement and did not have any questions or comments regarding the MTW Supplement at this time.
- [REDACTED] Thomas informed [REDACTED] Keith of the MTW meeting on November 17th, 2021, at 6:00pm and encouraged [REDACTED] Keith to inform the residents to attend the meeting. Mrs. Thomas also informed [REDACTED] Keith to inform the residents of that a copy of the MTW supplement will be available at the office or may emailed to residents upon request.
- [REDACTED] Keith asked on the status of the reopening of the senior building. [REDACTED] Thomas informed [REDACTED] Keith of the recent renovations that has been complete and will possibly reopen next year once the CDC gives clarity on the condition of the pandemic.
- Meeting was adjourned at 5:25pm.

11.17.2021 Moving to work Resident's Meeting

Resident Comments

Alfrieda Thomas, Director of Resident services announced to all residents that everyone can request a copy of MTW Supplement by picking up a copy from the main office at 48 Ball Street or via email. All emails placed in the chat of this zoom meeting will be emailed a copy of the MTW supplement.

- **Question1- [REDACTED]: How will minimum rent change the current policies?**

Answer: * [REDACTED] Atkinson responded: the current minimum rent is calculated based upon income. A minimum rent candidate would be selected if the calculated rent is below \$50.00. *K. Ralls stated the current minimum rent is \$50.00. HAN (PH) currently has approximately 40 households who are Minimum Rent Candidates and total of approximately 103 households who receive a Utility Reimbursements. This activity will reduce the number of households to receive a credit on their account and receive a utility reimbursement.

- **Question 2- [REDACTED] How would MTW effect Newnan Crossing Apartments? Me and My wife are receiving disability benefits at the moment.**

Answer: * [REDACTED] Ralls responded: Minimum Rent will only affect those who are in extremely low to no income. Elderly and disable residents will be exempt from the Minimum Rent MTW Activity.

- **[REDACTED] Question 3-: My Aunt was unable to join the call but is disabled and would like to know how will her rent be affected?**

Answer: [REDACTED] Thomas responded: Minimum Rent will only affect those who are in extremely low to no income. Elderly and disable residents will be exempt from the Minimum Rent MTW Activity. However, if she would like a copy of the MTW supplement for review. HAN will provide her with one and answer additional questions specifically to her rent calculations.

- **[REDACTED] Question 4: My child is in a home daycare. Will the Childcare Deduction MTW Activity effect my rent as along as I bring proof?**

Answer: * [REDACTED] Thomas responded: the same rules will apply to home daycare centers as they apply to daycare facilities. [REDACTED] Atkinson stated the daycare facilities must be licensed daycare providers to claim childcare deductions in rent calculations.

- **[REDACTED] Question 5: I used to get utility reimbursement, but I do not anymore. Is there a reason why?**

Answer: [REDACTED] Atkinson responded: Please contact me to discuss rent calculation. Minimum rent will only affect a select few of residents.

- **[REDACTED] Question 6: I am planning on moving next year. Will MTW affect my transfer, or would I have to wait until my recertification every 3 years?**

Answer: [REDACTED] Thomas responded: No. MTW would not affect your plans to move. You may contact the HCV Coordinator Mrs. Martinez to discuss Section 8 transfers.

- [REDACTED] **Question 7: As we're going through process are they are resources to help those who need additional help?**

Answer: * [REDACTED] Thomas responded: The HAN has an FSS program that residents may participate to assist in self-sufficiency. HAN's Resident services department will be happy to assist willing residents who are needing assistance with meeting their goals such as completion of education programs and home ownership. FSS is also a great program that accrues escrow and after the program is completed the participants are awarded the escrow that was accumulated.

- [REDACTED] **Question 8: What if only one party in the household is disabled?**

Answer: [REDACTED] Ralls responded: Disabled households are those whom households are head of household.

Answer: [REDACTED] Atkinson. Those whom are in the household who are abled bodied and over 18 years of age will adhere to MTW rules.

12.15.2021 Moving to Work Public Hearing

Public Comments

Khristian Ralls, Moving to Work Coordinator opened the meeting for brief overview of the MTW supplement, hardship policies and impact analysis. Attendees were allowed to make comments in regard to the MTW Supplement. Khristian Ralls announced to all residents that everyone can request a copy of MTW Supplement by picking up a copy from the main office at 48 Ball Street or via email. All emails placed in the chat of this zoom meeting will be emailed a copy of the MTW supplement.

- **Question1- [REDACTED]: I want to know if a landlord can go up on your rent at any time. I do not want a rent because of the Market Value inflation and rent going up a couple hundred of dollars at a time.**

Answer: [REDACTED] Martinez: Yes, a landlord can raise the rent to match the market increases. However as reasonable raise in rent must be approved and compared with other properties in the area.

- **Question 2- [REDACTED]: What can a tenant do to handle the increase?**

Answer: [REDACTED] Martinez: A tenant will have the choice to move to a more affordable home, if the rent that is raised becomes unaffordable. Rent increase are not allowed during the 12-month leasing period.

- **[REDACTED] Question 3-: I like the idea of MTW what will happen to people who has children with disabilities who need childcare?**

Answer: * A Thomas responded: Minimum Rent will only affect those who are in extremely low to no income. Elderly and disable residents will be exempt from the Minimum Rent MTW Activity. However, if she would like a copy of the MTW supplement for review. HAN will provide her with one and answer additional questions specifically to her rent calculations.

- **[REDACTED]: Please explain CAPS and tenants paying out of pocket.**

Answer: Khristian explained the breakdown of how CAPS are applied and the maximum amount of childcare that can be deducted to calculate monthly rent: the same rules will apply to home daycare centers as they apply to daycare facilities.

No other comments and questions were made, and the meeting was dismissed.

Housing Authority of Newnan MTW

Hardship Policy

HAN's Hardship Policy will apply to the following activities: *1.e, 1f. Minimum Rent, 1.r, 1.s Elimination of Deductions, and 3.a, 3.b Alternative Reexamination*. If the household gross income has decreased 10% or greater, families may request an interim for hardship if the family experienced decrease in income because of a changed circumstance due to loss/reduction in employment, death in the family's income earner, reduction in other earnings or assistance that cannot be replaced, or if there has been an increase because of changed circumstances for medical cost, childcare, transportation, education, etc. Proof must provide supporting evidence of how the MTW activity/activities caused an undue financial burden and may include current expenses relate to childcare, health, transportation, and similar supporting proof.

While the hardship request is under review, the HAN will suspend the MTW activity/activities for the household, beginning the next month after the request, until the HAN has determined if the request is warranted. If HAN determines a hardship exist, the HAN will continue to provide the household an exemption from the MTW activity/activities for up to 90 days. The HAN will determine what constitutes a financial hardship and it will be defined but not limited to following:

- The family has experienced a decrease in income because of changed circumstances, including loss or reduction of employment, death in the family, or reduction in or loss of earnings or other assistance;
- The family has experienced an increase in expenses, because of changed circumstances, for medical costs, childcare, transportation, education, or similar items; and
- Such other situations and factors determined by the agency to be appropriate.

If the hardship request does not meet its hardship standards, the household must resume the MTW activity/activities, and the HAN will collect any retroactive rent if applicable through a reasonable repayment agreement. Upon request, HAN will accept hardship applications and will grant adjustments in accordance with its Hardship Policy on a case-by case basis.

Grievance Procedures

All grievances shall be heard by the Housing Authority's Hearing Officer appointed to hear such matters. The Hearing Officer is empowered to rule on the grievance in the manner and in accordance with the time frames which are set forth in the Policy. Prior to initiating a formal grievance, the resident must seek to have the grievance resolved informally. The complaint must be in writing and submitted to the Administrative Office within ten (10) days from the date when the grievance arose. The informal discussion must be held within seven (7) days and there must be an attempt to resolve the complaint without a formal hearing. A summary of the discussion shall be prepared by the Authority within ten (10) days after the discussion. If the resident disagrees with the decision of the informal discussion the resident can file a request for a Grievance Hearing. The resident shall be entitled to a fair and private

hearing and may be represented by legal counsel or another person chosen as a representative. At the hearing the resident should show why the Authority's proposed action is improper. The burden of proof will then be on the Authority to justify the action or inaction proposed by it. The decision of the Hearing Officer shall be based solely and exclusively upon the facts and documents presented at the hearing. The decision shall be issued in writing within ten (10) calendar days after the hearing. The decision of the Hearing Officer shall be binding upon the parties unless such decision violated Federal Regulations or the Grievance Policy. Should this be the case the decision will be amended. The Final Decision can be appealed to the Executive Director within seven days. The Executive Director will issue a written decision within a reasonable period after consideration of the appeal.

1.e Minimum Rent (PH)

Through implementation of this activity, HAN's effort is to promote our (PH) participants toward *Self-Sufficiency and achieve Cost Effectiveness* of federal dollars and other agency cost.

- Implementation of this activity will impact on agency finances by reducing Utility Reimbursement Payments. HAN's current minimum rent is \$50.00. HAN (PH) currently has approximately 40 households who are Minimum Rent Candidates and total of approximately 103 households who receive a Utility Reimbursements. The current total amount of utility reimbursements issued each month estimates at \$ 11,874.00 per month. This activity will reduce the number of households to receive a credit on their account and receive a utility reimbursement. After implementation of this activity, utility reimbursements issued each month will be approximately \$3,634 per month and will reduce agency cost on UR approximately 70%.

Implementation of this activity will impact the *Housing Cost Affordability* by increasing the minimum rent to \$130 to all participants. This MTW activity will be effective July 1, 2022. Rent Increases will be adjusted during the household annual recertification. Upon request, HAN will accept hardship applications and will grant adjustments in accordance with the HAN Hardship Policy on a case-by case basis.

- This activity will not impact *the waitlist(s)*
- All elderly and disabled households will be exempt from participating in this activity. Therefore, this activity will not impact elderly and disabled families.
- HAN will monitor impact of the *termination rates* after implementation of this activity. HAN's Hardship Policy will lessen the overall impact of *terminations rates*.
- This activity will not impact *Public Housing occupancy level and voucher utilization*.
- This activity will meet the *MTW Statutory goals of cost effectiveness, self-sufficiency, and or/ housing choice* by reducing agency cost of utility reimbursements and increase participant's self-sufficiency. HAN will measure this activity by conducting an analysis on the number of households who do not currently contribute income towards their rental cost and/or households who are awarded a utility reimbursement.
- This activity will meet the five *MTW statutory requirements*.
- HAN will monitor the number of *hardship request* and the number granted and denied as a result of this MTW activity.

1.f Minimum Rent (HCV)

Through implementation of this activity, HAN's effort is to promote our (HCV) participants toward *Self-Sufficiency and achieve Cost Effectiveness* of federal dollars and other agency cost.

Implementation of this activity will have impact on agency finances by reducing utility reimbursement payments. HAN's current minimum rent is \$50.00. HAN (HCV) currently has approximately 25 households who are Minimum Rent Candidates, and a total of approximately 22 households who receive a utility reimbursement. The current total amount of HAP spending each month is approximately \$29,434.00. After implementation of this activity, HAP spending will be reduced to \$27,434.00 and will save the agency approximately \$2,000 per month.

- This activity will decrease the number of Minimum Rent Candidates from 40 to approximately 36, and a total of 45 households to receive a utility reimbursement. The current total amount of utility reimbursements issued each month will be approximately \$3,634 per month and will reduce agency cost on UR approximately 70%.

Implementation of this activity will impact the *Housing Cost Affordability* by increasing the minimum rent to \$130 to all participants. This MTW activity will be effective July 1, 2022. Rent Increases will be adjusted during the household annual recertification. Upon request, HAN will accept hardship applications and will grant adjustments in accordance with its Hardship Policy on a case-by case basis.

- This activity will not impact *the waitlist(s)*
- All elderly and disabled households will be exempt from participating in this activity. Therefore, this activity will not impact elderly and disabled families.
- HAN will monitor the impact of the *termination* rates after implementation of this activity. HAN's Hardship Policy will lessen the overall impact of terminations rates.
- This activity will not impact *Public Housing occupancy level and voucher utilization*.
- This activity will meet *the MTW Statutory goals of cost effectiveness, self-sufficiency, and or/ housing choice* by reducing agency cost of utility reimbursements and increase participant's self-sufficiency. HAN will measure this activity by conducting an analysis on the number of households who do not currently contribute income towards their rental cost and households cost and/or households who are awarded a utility reimbursement.
- This activity will meet the five *MTW statutory requirements*.
- HAN will monitor the number of hardship request and the number granted and denied as a result of this MTW activity.

1.r. Elimination of Deductions (Childcare)/(PH)

Through implementation of this activity, HAN’s efforts are to promote our (PH) participants toward *Self-Sufficiency* and achieve *Cost Effectiveness* of federal dollars and other agency cost.

Implementation of this Activity will Impact the *Agency’s Finances*. This activity will modify existing rules and regulations to the childcare deduction and create a limit/cap on the amount of childcare deduction applied to the participant’s rent calculation. This activity allows HAN to place a cap on childcare deductions that will replicate the Georgia Childcare and Parent Services (GA CAPS). The Georgia Department of Early Care and Learning provides low-income families afford safe, and quality childcare by subsidizing childcare costs for children under the age of 13.

HAN will measure this activity by conducting an analysis on the reduction of childcare deductions included in the PH rent calculations. This activity will increase Total Tenant Payments (TTP) as well as increase agency revenue. HAN’s current childcare deductions for (PH) is approximately \$ 290,594.00.

HAN’s goal is to reduce the amount of childcare deduction calculated in the TTP. This will increase participant’s self-sufficiency and agency revenue.

HAN will align childcare costs to match the GA CAPS reimbursement amounts according to the categorical maximum amounts filtered by age. Upon request, HAN will accept hardship applications and will grant adjustments in accordance with its Hardship Policy on a case-by case basis.

HAN’s current policy allows participants to deduct 100% of childcare cost from the annual total household income without limitations of cost.

Type of Care	Zone 1			Zone 2			Zone 3		
	Center	Family	Informal	Center	Family	Informal	Center	Family	Informal
Full-time (per week)									
Infant (birth - 12 months)	\$150	\$125	\$95	\$110	\$90	\$80	\$85	\$80	\$50
Toddler (1-2 years)	\$144	\$120	\$85	\$102	\$88	\$80	\$85	\$76	\$50
Preschool (3-5 years)	\$124	\$105	\$75	\$92	\$85	\$70	\$80	\$75	\$49
School age (6 years & older)	\$115	\$85	\$75	\$90	\$75	\$70	\$75	\$75	\$49
Part-time (per day)									
All ages	\$40	\$30	\$25	\$27	\$25	\$22	\$21	\$20	\$15
Before and after school (per week)									
All ages	\$70	\$55	\$50	\$60	\$53	\$50	\$45	\$40	\$35

[AppendixC-CAPS Reimbursement Rates.pdf \(ga.gov\)](#)

This activity will impact the Housing Cost Affordability by creating a limit/cap on childcare deductions that will not exceed the GA CAPS Reimbursement Rates. Upon request, HAN will accept hardship applications and will grant adjustments in accordance with its Hardship Policy on a case-by case basis.

- This activity will not impact the waitlist(s)
- All elderly and disabled households will be exempt from participating in this activity. Therefore, this activity will not impact elderly and disabled families.
- HAN will monitor impact of the termination rates after implementation this activity. HAN's Hardship Policy will lessen the overall impact of terminations rates.
- This activity will not impact Public Housing occupancy level and voucher utilization
- This activity will meet the MTW Statutory goals of cost effectiveness, self-sufficiency, and or/ housing choice by reducing the amount of childcare deductions calculated in the Total Tenant Payment (TTP) and increase participant's self-sufficiency. Implementation of this activity will reduce the amount of childcare deductions calculated in TTP by approximately 95%.
- *This activity will meets the five MTW statutory requirements.*
- HAN will monitor the number of hardship request and the number granted and denied as a result of this MTW activity.

1.s. Elimination of Deductions (Childcare)/(HCV)

Through implementation of this activity, HAN’s effort is to promote our (HCV) participants toward *Self-Sufficiency* and achieve *Cost Effectiveness* of federal dollars and other agency cost.

Implementation of this Activity will Impact the *Agency’s Finances*. *This activity* will modify existing rules and regulations to the childcare deduction and create a limit/cap on the amount of childcare deduction applied to the participant’s rent calculation. The activity allows HAN to place a cap on childcare deductions in line the Georgia Childcare and Parent Services (GA CAPS). The Georgia Department of Early Care and Learning provides low-income families afford safe, and quality childcare by subsidizing childcare costs for children under the age of 13.

HAN will measure this activity by conducting an analysis on the reduction of childcare deductions included in the HCV rent calculations which will increase Total Tenant Payments (TTP) and increase agency revenue. HAN current childcare deductions for (HCV) is approximately \$15,640.

HAN’s goal is to reduce the amount of childcare deduction calculated in the TTP. This will increase participant’s self-sufficiency and agency revenue.

HAN will align childcare costs to match the GA CAPS reimbursement amounts according to the categorical maximum amounts filtered by age. Upon request, HAN will accept hardship applications and will grant adjustments in accordance with its Hardship Policy on a case-by case basis.

HAN’s current policy allows participants to deduct 100% of childcare cost from the annual total household income without limitations of cost.

Type of Care	Zone 1			Zone 2			Zone 3		
	Center	Family	Informal	Center	Family	Informal	Center	Family	Informal
Full-time (per week)									
Infant (birth - 12 months)	\$150	\$125	\$95	\$110	\$90	\$80	\$85	\$80	\$50
Toddler (1-2 years)	\$144	\$120	\$85	\$102	\$88	\$80	\$85	\$76	\$50
Preschool (3-5 years)	\$124	\$105	\$75	\$92	\$85	\$70	\$80	\$75	\$49
School age (6 years & older)	\$115	\$85	\$75	\$90	\$75	\$70	\$75	\$75	\$49
Part-time (per day)									
All ages	\$40	\$30	\$25	\$27	\$25	\$22	\$21	\$20	\$15
Before and after school (per week)									
All ages	\$70	\$55	\$50	\$60	\$53	\$50	\$45	\$40	\$35

[AppendixC-CAPS Reimbursement Rates.pdf \(ga.gov\)](#)

This activity will impact the Housing Cost Affordability by creating a limit/cap on childcare deductions that will not exceed the GA CAPS Reimbursement Rates. Upon request, HAN will accept hardship applications and will grant adjustments in accordance with its Hardship Policy on a case-by case basis.

- This activity will not impact the waitlist(s)
- All elderly and disabled households will be exempt from participating in this activity. Therefore, this activity will not impact elderly and disabled families.
- HAN will monitor impact of the termination rates after implementation this activity. HAN's Hardship Policy will lessen the overall impact of terminations rates.
- This activity will not impact Public Housing occupancy level and voucher utilization
- This activity will meet the MTW Statutory goals of cost effectiveness, self-sufficiency, and or/ housing choice by reducing the amount of childcare deductions calculated in the Total Tenant Payment (TTP) and increase participant's self-sufficiency. Implementation of this activity will reduce the amount of childcare deductions calculated in TTP by approximately 95%.
- *This activity meets the five MTW statutory requirements.*
- HAN will monitor the number of hardship request and the number granted and denied as a result of this MTW activity.

Alternative Reexamination 3.a. (PH)

This activity will implement Biennial Recertification for family Units and Triennial Recertifications for elderly/disabled household for all PH Clients (New Admission and Currently Assisted) at all locations. HAN will allow an interim adjustment at the request of the household, if the household gross income has decreased 10% or more.

- This activity *Impact the Agency's Finances* by reducing staff time and costs, as well as being less invasive and time consuming for our residents. Current regulations require annual recertification and verification to determine that a household meets program requirements. All households that report no income or no income from wages on an annual recertification will be scheduled to report increases in income every 90 days.
- *This Activity will not impact Housing Cost Affordability*
- This activity will not impact the waitlist(s)
- All elderly and disabled households will be exempt from participating in this activity. Therefore, this activity will not impact elderly and disabled families.
- *This activity will not impact The termination rate (s)*
- This activity will not impact Public Housing occupancy level and voucher utilization
- *This Activity Meets the MTW Statutory goals of cost effectiveness, self-sufficiency, and or/ housing choice.* HAN will use this activity for all participants of the PH program. The agency as well as households will experience time savings due to fewer re-examinations and, HAN will save additional staff time by eliminating the need to process and update consent forms between scheduled reexaminations and manage the cumbersome process of beginning program termination for non-receipt of consent forms. Participant families on the biennial or triennial schedule may also see income savings as a result of HAN not recalculating rent portions during the interim.

HAN will measure this activity by conducting an analysis on the reduction of (PH) reexaminations completed per year and the reductions in administrative time to complete reexaminations.

HAN currently process approximately 422 (PH) Recertifications per year and averages 51 Recertifications per month. Approximately 12 recertifications per week are completed between 2 staff members. Implementation will significantly reduce annual recertifications by 50%. This activity will also reduce administrative time. It currently takes approximately 2 hours per reexamination to complete. Implementation of this activity will reduce administrative time from 24 hours per week to 12 hours per week. This activity will significantly reduce administrative time by 50%. Upon request, HAN will accept hardship applications and will grant adjustments in accordance with its Hardship Policy on a case-by case basis.

- *This activity meets the five MTW statutory requirements.*

- HAN will monitor the number of hardship request and the number granted and denied as a result of this MTW activity.

Alternative Reexamination 3.b. (HCV)

This activity will implement Biennial Recertification for family Units and Triennial Recertifications for elderly/disabled household for all HCV Clients. HAN will allow one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more.

This activity *Impact the Agency's Finances* by reducing staff time and costs, as well as being less invasive and time consuming for our residents. Current regulations require annual recertification and verification to determine that a household meets program requirements. All households that report no income or no income from wages on an annual recertification will be scheduled to report increases in income every 90 days.

- *This Activity will not impact Housing Cost Affordability*
- This activity will not impact the waitlist(s)
- All elderly and disabled households will be exempt from participating in this activity. Therefore, this activity will not impact elderly and disabled families.
- *This activity will not impact The termination rate (s)*
- This activity will not impact Public Housing occupancy level and voucher utilization
- *This Activity Meets the MTW Statutory goals of cost effectiveness, self-sufficiency, and or/ housing choice.* HAN will use this activity for all participants of the PH program. The agency as well as households will experience time savings due to fewer re-examinations and, HAN will save additional staff time by eliminating the need to process and update consent forms between scheduled reexaminations and manage the cumbersome process of beginning program termination for non-receipt of consent forms. Participant families on the biennial or triennial schedule may also see income savings as a result of HAN not recalculating rent portions during the interim.

HAN will measure this activity by conducting an analysis on the reduction of (HCV) reexaminations completed per year and the reductions in administrative time to complete reexaminations.

HAN currently process approximately 167 (HCV) Recertifications per year and averages 14 Recertifications per month. Approximately 4 recertifications per week are completed between 1 staff member. This activity will significantly reduce annual recertifications by 50%. This activity will also reduce administrative time. It currently takes approximately 2 hours per reexamination to complete. Implementation of this activity will reduce administrative time from 8 hours per week to 4 hours per week. Implementation will significantly reduce administrative time by 50%. Upon request, HAN will accept hardship applications and will grant adjustments in accordance with its Hardship Policy on a case-by case basis.

- *This activity meets the five MTW statutory requirements.*
- HAN will monitor the number of hardship request and the number granted and denied as a result of this MTW activity