

# PHA Name : Housing Authority Of The City Of Norwalk

**PHA Code :** CT002

**MTW Supplement for PHA Fiscal Year Beginning :** (MM/DD/YYYY): 4/1/2023

**PHA Program Type:** Combined

**MTW Cohort Number:** Landlord Incentives

**MTW Supplement Submission Type:** Annual Submission

## **B. MTW Supplement Narrative.**

As an MTW agency, the Norwalk Housing Authority (NHA) will be given the flexibility and authority to develop policies outside of the limitations of certain HUD regulations and provisions. The NHA was granted participation under the Moving to Work Expansion (MTW), Cohort #4 – Landlord Initiatives demonstration

The Norwalk Housing Authority is an innovative, progressive, high performing housing authority whose mission is to build, maintain, and preserve safe, affordable housing through well managed, mixed income properties that strengthen our community. The flexibilities allowed through the Moving-to-Work Program will support NHA's vision of empowering residents to achieve self-sufficiency by increasing family housing opportunities, supporting deconcentration of assisted families, encouraging greater landlord participation, promoting landlord retention, and reducing administrative burdens.

As the NHA is only applying MTW initiatives to its HCV program in this first supplement, NHA is able to focus its MTW efforts on its Housing Choice Voucher (HCV) program and families. The flexibilities allowed through the Moving-to-Work Program will allow the NHA to better meet its vision of increasing housing choices for families through enacting policies which encourage landlord participation and increase units available to families within the local market.

Through landlord incentives allowable through the MTW program, the NHA hopes to further housing choices and options for participating families, particularly in higher opportunity neighborhoods.

**C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).**

<b>1. Tenant Rent Policies</b>	
<b>2. Payment Standards and Rent Reasonableness</b>	
b. Payment Standards- Fair Market Rents (HCV)	Currently Implementing
<b>3. Reexaminations</b>	
<b>4. Landlord Leasing Incentives</b>	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Currently Implementing
b. Damage Claims (HCV-Tenant-based Assistance)	Currently Implementing
<b>5. Housing Quality Standards (HQS)</b>	
<b>6. Short-Term Assistance</b>	
<b>7. Term-Limited Assistance</b>	
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	
<b>9. Project-Based Voucher Program Flexibilities</b>	
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
<b>11. MTW Self-Sufficiency Program</b>	
<b>12. Work Requirement</b>	
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
<b>14. Moving on Policy</b>	
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
<b>17. Local, Non-Traditional Activities</b>	

**C. MTW Activities Plan that Housing Authority Of The City Of Norwalk Plans to Implement in the Submission Year or Is Currently Implementing**

<b>2.b. - Payment Standards- Fair Market Rents (HCV)</b>
Description: The PHA will establish a Payment Standard up to 120% of FMR
Agency goals for MTW activity: Increased housing choice for families.
How activity contributes to larger initiative (if applicable): This initiative promotes family choice in units, allowing families to potentially lease in higher opportunity areas, thus expanding housing choice.
<b>This MTW activity serves the following statutory objectives:</b>
Self-sufficiency;Housing choice
<b>This MTW activity has the following cost implications:</b>
Increased expenditures
<b>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.</b>
The MTW activity applies only to a subset or subsets of assisted households
<b>This MTW activity applies to:</b>
New admissions and currently assisted households
<b>An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).</b>

The MTW activity applies to all family types

**The MTW activity applies to all tenant-based units**

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

Implementation only began in November, 2022, not enough data has been collected to yet show accomplishments or changes during implementation.

**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, Housing Authority Of The City Of Norwalk 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 will explain the payment standards by FMR:**

The Norwalk Housing Authority has established payment standards using its current two-tier approach and will pay up to 110 % of FMR for units in low-to-moderate income census tracts and up to 120 % of FMR in units in moderate-to-high income census tracts. This will encourage tenants to move to areas of higher opportunity and will encourage landlords to rent to more section 8 tenants. In the long-term this should result in better outcomes for tenants, particularly families with children, and increased opportunities for housing choice and self-sufficiency.

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

Description: At HAP Contract execution, the PHA will pay up to one month's vacancy loss to participating landlords, upon the unit being vacated by a participating family.

Agency goals for MTW activity: Increases opportunities for housing choice by encouraging participating landlords to hold units for section 8 tenants. Provides participating landlords with an opportunity to repair and/or upgrade units without experiencing vacancy loss.

**This MTW activity serves the following statutory objectives:**

Housing choice

**This MTW activity has the following cost implications:**

Increased 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**

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

Implementation only began in November, 2022, not enough data has been collected to show accomplishments or changes.

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Housing Authority Of The City Of Norwalk 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**

\$Up to one month's contract rent under the old HAP contract..

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

Description: The NHA will reimburse landlords for tenant-caused damages (minus security deposit) up to two months contract rent after tenancy. The NHA will require proof that damages are beyond ordinary wear and tear, and documentation of the charges to the tenant's security deposit prior to the claim to the PHA. Documentation of actual damage costs are required; the PHA will not pay based on estimates. The PHA may charge these costs to the tenant as a condition for remaining on the program.

Agency goals for MTW activity: Increases participating landlords, thus increasing housing opportunities for low-income families.

**This MTW activity serves the following statutory objectives:**

Housing choice

**This MTW activity has the following cost implications:**

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 to all family types

**The MTW activity applies to all tenant-based units**

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

Implementation only began in November, 2022, not enough data has been collected to show accomplishments or changes.

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Housing Authority Of The City Of Norwalk 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**

\$Up to two month's contract rent under the HAP contract..

**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.**

<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<b>Safe Harbor Waivers seeking HUD Approval:</b> No Safe Harbor Waivers are being requested.

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>
<b>E.1</b>	<b>Agency-Specific Waiver(s) for HUD Approval:</b>  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.
<b>E.2</b>	<b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b> MTW Agency does not have approved Agency-Specific Waivers

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

<b>Federal Fiscal Year (FFY)</b>	<b>Total Operating Subsidy Authorized Amount</b>	<b>How Much PHA Disbursed by the 9/30 Reporting Period</b>	<b>Remaining Not Yet Disbursed</b>	<b>Deadline</b>
2022	\$4,006,477	\$4,006,477	\$0	2022-12-31

<b>G.</b>	<b>MTW Statutory Requirements.</b>	
<b>G.1</b>	<b>75% Very Low Income – Local, Non-Traditional.</b> HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	<b>Income Level</b>	<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
	80%-50% Area Median Income	0
	49%-30% Area Median Income	8
	Below 30% Area Median Income	91
	<b>Total Local, Non-Traditional Households</b>	<b>99</b>

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

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>
MTW agency did not established a rent reform policy to encourage employment and self-sufficiency None	

<b>G.3</b>	<b>Substantially the Same (STS) – Local, Non-Traditional.</b>
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	11,819 # 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.	8,942 # of unit months

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

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

<b>Family Size:</b>	<b>Occupied Number of Local, Non-Traditional units by Household Size</b>
1 Person	399
2 Person	230
3 Person	163
4 Person	104
5 Person	38
6+ Person	20
<b>Totals</b>	<b>954</b>

<b>H.</b>	<b>Public Comment</b>
	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

<b>I.</b>	<b>Evaluations.</b>
	No known evaluations.

**MTW CERTIFICATIONS OF COMPLIANCE****U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
OFFICE OF PUBLIC AND INDIAN HOUSING****Certifications of Compliance with Regulations:  
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (01/04/2023), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

Norwalk Housing Authority

CT002

**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).*

*Adam Bovilsky*

Secretary of the Board

**NAME OF AUTHORIZED OFFICIAL**

**TITLE**

*[Handwritten Signature]*

*2/2/2023*

**SIGNATURE**

**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.**

## **Comments from August 2, 2022 Public Hearing:**

1. Did I understand that the tenant would be responsible for wear and tear?
2. Can a tenant get a move out inspection to show that everything is fine?
3. Would old Housing Quality Standards inspections be something tenants could use to show they didn't cause damages?
4. What's in place to protect the tenants if the landlord claims they caused damage that they did not cause?
5. If a company has an internal property management system would they have to go internally for quote for damages, or externally?

## **July 11, 2022 Resident Advisory Board Meeting Public Comments**

1. How would you know if a landlord makes a false claim of damages?
2. What's in place to protect the tenants?
3. Is there a fee for small claims court if the Landlord deducts costs from the security deposit and the tenant needs to sue them?
4. How will this be advertised to recruit new landlords?

## **Norwalk Housing Authority Response to RAB and Public Comments:**

**How would you know if a landlord makes a false claim of damages? What's in place to protect tenants?**

Landlords will be required to provide proof that the damages existed, that they were caused by the tenants, and proof of the cost of claims. We also recommend, as we always have, that tenants take move in and move-out pictures of their own in order to protect their security deposits.

**Could a tenant get a move out inspection to show everything is fine?**

We do not have the staff to do move out inspections for every tenant who moves out, however a landlord who intends to make a claim would be required to get an inspection. We also encourage tenants to take pictures to show the condition of the unit when they moved out.

**Would old Housing Quality Standards inspections be something tenants could use to show they didn't cause damages?**

Housing Quality Standards inspections would be available to be used to determine the veracity of any claims of damage.

**If a company has an internal property management system would they have to go internally for quote for damages, or externally?**

The company would have to demonstrate the actual cost to repair the damages claimed. What will be considered adequate proof is laid out in the plan, and will be discussed between the company and the Director of Housing if additional proof is necessary.

**Is there a fee for small claims court if the Landlord deducts costs from the security deposit and the tenant needs to sue them?**

There is a fee for small claims court, however those who cannot afford it can apply for a fee waiver. The NHA would not get involved in a security deposit dispute.

**How will this be advertised to recruit new landlords?**

There has already been a landlord meeting to discuss this back when the NHA first applied to become a Moving to Work Agency. These changes are also advertised in the newspaper, and on our website. Additionally, we have an annual landlord meeting which we invite all landlords in Norwalk to, and will be using that to advertise these changes as well.

### **Hardship Policy**

In order to qualify for a hardship exemption, households must meet all of the criteria listed below:

1. The household is in compliance with all the program rules and regulations.
2. The household does not owe the Norwalk Housing Authority any money or is current with a repayment agreement.
3. The household must be admitted to the program prior to April 1, 2022.
4. The household has not relocated on or after April 1, 2022.
5. The household must experience an increase of 5% or more in rent as a direct result of the MTW rent reform initiatives.
6. The household must request the hardship waiver within 10 business days from the date of the letter notifying them of change and giving the timeline in which to request an Informal Hearing or Hardship Review.
7. The household has not received a rent reform hardship relief for the Payment Standards application at interim recertification previously.

#### **Hardship Waiver Approval Process**

Households who meet the criteria listed above may mail, fax, or e-mail their request to the Director of Housing Operations at the Norwalk Housing Authority.

If there are no other issues, the Director of Housing Operations will approve a new rent as calculated by the Housing Specialist. If there are other issues, the supervisor will conduct further review.

Hardship Relief for households who qualify and receive waiver approval may pay their portion of rent based on the calculation under HUD regulations until their next recertification or relocation. At the next annual recertification, biennial recertification, or relocation, whichever comes first, the household will automatically be subject to the payment standards set by the Norwalk Housing Authority at that time.

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