

PHA Name : Housing Authority Of The City Of Norwalk

PHA Code : CT002

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 4/1/2024

PHA Program Type: Combined

MTW Cohort Number: Landlord Incentives

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

B.1 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, maintaining and increasing the supply of affordable housing available in the City of Norwalk, encouraging greater landlord participation, promoting landlord retention, and reducing administrative burdens.

Through landlord incentives allowable through the MTW program and allowing prequalifying HQS inspections for apartments, the NHA hopes to further housing choices and options for participating families, particularly in higher opportunity neighborhoods. 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 streamlining processes, such as allowing recertifications every three years for residents with only fixed income sources, and using its own inspectors for rent reasonableness and HQS inspections in units owned by its wholly owned subsidiary Sound Communities, the NHA will increase cost-effectiveness as well as reduce the administrative barriers faced by current and prospective tenants. By using local non-traditional waivers to renovate buildings owned by its wholly owned subsidiary, Sound Communities, the NHA will increase and preserve the supply of affordable housing available in the City of Norwalk. This will also increase housing options for voucher holders facing barriers in the marketplace, such as bad credit who may otherwise have difficulty finding housing.

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	
2. Payment Standards and Rent Reasonableness	
b. Payment Standards- Fair Market Rents (HCV)	Currently Implementing
d. Rent Reasonableness – Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Plan to Implement in the Submission Year
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Currently Implementing
b. Damage Claims (HCV-Tenant-based Assistance)	Currently Implementing
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Plan to Implement in the Submission Year
c. Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
d. Alternative Inspection Schedule (HCV)	Plan to Implement in the Submission Year
6. Short-Term Assistance	
7. Term-Limited Assistance	
8. Increase Elderly Age (PH & HCV)	
9. Project-Based Voucher Program Flexibilities	
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Plan to Implement in the Submission Year
10. Family Self-Sufficiency Program with MTW Flexibility	
11. MTW Self-Sufficiency Program	
12. Work Requirement	
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
14. Moving on Policy	
15. Acquisition without Prior HUD Approval (PH)	
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	
c. Housing Development Programs	Plan to Implement in the Submission Year

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

2.b. - Payment Standards- Fair Market Rents (HCV)
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>Narrative Description: The PHA will establish a Payment Standard up to 120% of FMR .</p> <p>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.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Self-sufficiency; Housing choice</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p>

Increased expenditures

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

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

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.

The NHA implemented a two-tier payment standard, offering 107% of the FMR for units located in census tracts of lower opportunity, and 120% of the FMR in census tracts of higher opportunity. In conjunction with the local CoC, the NHA also added a mobility counselor to assist HCV voucher holders moving, intended to focus particularly on families with children under 13 and tenants who would be facing additional barriers in finding new apartments. As a result of these changes, the percent of moving HCV holders who moved from lower to higher opportunity areas increased for the first time in multiple years.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

No

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

No

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

Does the impact analysis apply to more than this MTW activity?

No

Please explain the payment standards by FMR:

The Norwalk Housing Authority will establish payment standards using its current two-tier approach, and will pay up to 112 % 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.

2.d. - Rent Reasonableness – Third-Party Requirement (HCV)

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

Narrative Description: The NHA's wholly owned subsidiary Sound Communities, owns and manages a number of affordable units, including those owned and operated by Norwalk Mutual Housing and Mutual Housing of Fairfield County. The PHA would use its own inspectors for rent reasonableness determinations for voucher holders seeking to rent in any property owned and managed by Sound Communities.

Agency goals for MTW activity: Increased housing choice for families.
Increased cost effectiveness.

How activity contributes to larger initiative (if applicable): Hiring outside inspectors to inspect these units before allowing voucher holders to move in would be time-consuming and expensive, causing delays to tenants and additional costs for the PHA.

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

Cost effectiveness; Housing choice

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

Decreased expenditures

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

n/a

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

No

Please explain or upload a description of the quality assurance method.

The NHA will hire an outside contractor to review the inspections of 10% of the units subject to this waiver every year. Clients may also request an outside contractor perform the rent reasonableness determination if they are not satisfied with the internal results.

No document is attached.

Please explain or upload a description of the rent reasonableness determination method.

This document is attached.

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

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

Narrative Description: THE PHA will conduct reexaminations every three years for families with only fixed incomes in HCV

and public housing, unless household income decreases. The implementation of this will be staggered, to go into effect the first year for a third of the residents, a second year for another third and the third year for the last third, to reduce overall staff burden.

Agency goals for MTW activity:
Cost Effectiveness

How activity contributes to larger initiative (if applicable):
This initiative reduces the burdens on families and staff by only conducting reexaminations for households whose only income sources are fixed income.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

Families with only fixed income sources

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

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

n/a

Does this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

No

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

No

How many hardship requests have been received associated with this activity in the past year?

No hardship were requested in the most recent fiscal year.

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

Does the impact analysis apply to more than this MTW activity?

Yes

Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)

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

What is the recertification schedule?

Once every three years

How many interim recertifications per year may a household request?

2 or more

Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.

Families with reduced income may request an immediate interim re-examination to reduce their portion of the rent. If a family requests an interim re-examination due to reduced income, subsequent increases in income must be reported and will prompt another interim re-examination.

Families with changes in income or household circumstances will be required to report them within the same timeline as all other households. For additions to the family or the addition of an income source that is not fixed, a reexamination will be made at that time. Otherwise, the increase will be noted in the file and no action taken until reexamination. If a family adds an income source that is not fixed, they will also be subject to annual reexaminations.

If a family moves into a new unit, a full reexamination will be conducted and the household's reexamination schedule will be reset.

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

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

Description: THE PHA will conduct reexaminations every three years for families with only fixed incomes in HCV and public housing, unless household income decreases. The implementation of this will be staggered, to go into effect the first year for a third of the residents, a second year for another third and the third year for the last third, to reduce overall staff burden.

Agency goals for MTW activity:
Cost Effectiveness

How activity contributes to larger initiative (if applicable):

This initiative reduces the burdens on families and staff by only conducting reexaminations for households whose only income sources are fixed income.

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

Cost effectiveness

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

Decreased expenditures

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

n/a

Does this MTW activity require a hardship policy?

Provided Already

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

Yes

What is the status of the Safe Harbor Waiver request?

Does the MTW activity require an impact analysis?

Provided Already

What is the recertification schedule?

Once every three years

How many interim recertifications per year may a household request?

2 or more

Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.

Approved rent increases to the landlord will use the most current payment standard.

Families with reduced income may request an immediate interim re-examination to reduce their portion of the rent. If a family requests an interim re-examination due to reduced income, subsequent increases in income must be reported and will prompt another interim re-examination.

Families with changes in income or household circumstances will be required to report them within the same timeline as all other households. For additions to the family or the addition of an income source that is not fixed, a reexamination will be made at that time. Otherwise, the increase will be noted in the file and no action taken until reexamination. If a family adds an income source that is not fixed, they will also be subject to annual reexaminations.

If a family moves into a new unit, a full reexamination will be conducted and the household's reexamination schedule will be reset.

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

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW

activity contributes to a larger initiative

Narrative 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.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

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.

Landlords have expressed more willingness to work with the section 8 program and to work with new tenants who will also be section 8 participants on move-in dates.

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

No

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

To all units

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

1 month's contract rent under the HAP contract of the outgoing tenant.

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

0

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

\$0

4.b. - Damage Claims (HCV-Tenant-based Assistance)**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

Description: 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.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

Although no damage claims were made in the previous fiscal year, several have been made in the current fiscal year, and landlords have represented that this makes them more eager to work with the NHA in housing future tenants. This has also been a useful point for the mobility counselor to use to build relationships with landlords so they will notify her of available units.

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

No

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

To all units

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

2 months contract rent

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

0

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

\$0

5.a. - Pre-Qualifying Unit Inspections (HCV)

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

Description: The PHA will allow inspections of a unit to qualify the unit as HQS compliant for up to 90 days before the HCV holder moves in.

Agency goals for MTW activity: Increased housing choice for families.
Increased cost effectiveness.

How activity contributes to larger initiative (if applicable):

This initiative promotes family choice in units, by streamlining the move in process so that a landlord wishing to rent to section 8 tenants may pre-qualify the unit, reducing the barriers and uncertainties of renting to Section 8 tenants.

This will also increase cost effectiveness by enabling inspectors to more efficiently schedule inspections and enabling the housing specialists to more quickly move residents into units.

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

Cost effectiveness; Housing choice

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

n/a

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

No

How long is the pre-inspection valid for?

The pre-inspection is valid for 90 days.

5.c. - Third-Party Requirement (HCV)

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

Narrative Description: The NHA's wholly owned subsidiary, Sound Communities, owns and manages a number of affordable units, including those owned and operated by Norwalk Mutual Housing and Mutual Housing of Fairfield County. The PHA would use its own inspectors for HQS inspections for all properties owned and managed by Sound Communities. PHA.

Agency goals for MTW activity: Increased housing choice for families.
Increased cost effectiveness.

How activity contributes to larger initiative (if applicable): Hiring outside inspectors to inspect these units before allowing voucher holders to move in would be time-consuming and expensive, causing delays to tenants and additional costs for the PHA.

Applies to all HCV and PBV units owned or managed by Sound Communities

<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness; Housing choice</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Decreased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>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.</p> <p>n/a</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Please explain or upload the description of the quality assurance method:</p> <p>Following will explain the quality assurance method To ensure quality control the NHA will hire outside contractors to conduct HQS inspections for 10% of the section 8 units at Sound Communities properties annually.</p> <p>Any Section 8 resident in these properties who is not satisfied with the NHA HQS inspection may request a quality control inspection by an outside contractor.</p> <p>These quality control inspection requests will be limited to 3 a year per resident for HQS inspections to avoid abuse.</p> <p>No document is attached.</p>

<p>5.d. - Alternative Inspection Schedule (HCV)</p>
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>Narrative Description: THE PHA will conduct reexaminations every three years for families with only fixed incomes. To simplify the inspection process, the PHA will conduct HQS inspections for these households every three years, at the same time as the re-certifications are done.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Decreased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>

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

n/a

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

No

9.c. - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)

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

Description: The NHA will project base vouchers in buildings owned and managed by its wholly owned subsidiary, Sound Communities, including those properties under Mutual Housing without going through the normal procurement process. This will increase housing choice for low income residents or those with low credit scores, and reduce employee time and hours. HQS inspections will be performed by agency staff, with the same quality control mechanisms as those listed in waivers 2.d and 5.c.

Agency goals for MTW activity: Increase access to affordable housing and housing choice options for those who may have difficulty finding units on the private market.

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

Cost effectiveness; Housing choice

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

Decreased expenditures

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

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

The MTW activity applies to developments owned and managed by the NHA's wholly owned subsidiary Sound Communities, including Mutual Housing properties.

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

n/a

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

No

17.c. - Housing Development Programs

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

Description: With rents increasing every year, the NHA seeks to preserve and increase the supply of affordable housing available in the City of Norwalk, and through its wholly owned subsidiary, Sound Communities, owns and manages a number of affordable units, including those owned and operated by mutual housing. The PHA would renovate these units, which have substantial needs. No more than 10% of the NHA's HAP budget would be spent on these local nontraditional activities. The waiver would achieve the goal of renovating and preserving affordable housing in Norwalk by allowing the NHA to spend necessary money to renovate and preserve non-PHA affordable housing units.

In accordance with the Safe Harbors, the NHA will ensure that all families in Sound Communities units that are renovated using MTW funds will be at 80% AMI or below.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

Properties owned and managed by the NHA's wholly owned subsidiary, Sound Communities, including those of Mutual Housing.

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

n.a

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

No

Table 17.c.1 - Housing Development Programs that the MTW Agency plans to commit Funds to in Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Robert Wood Cooperative	Rehabilitation	Other-rehabilitation	10.00	10.00	10.00	0.00	0.00	0.00
39 Chestnut St.	Rehabilitation	other-rehabilitation	7.00	7.00	7.00	0.00	0.00	0.00
Hanford Housing Cooperative	Rehabilitation	Other-rehabilitation	15.00	15.00	15.00	0.00	0.00	0.00
79 S. Main	Rehabilitation	Other-rehabilitation	15.00	15.00	15.00	0.00	0.00	0.00
Arch St.	Rehabilitation	Other-rehabilitation	8.00	8.00	8.00	0.00	0.00	0.00
			0.00	0.00	0.00	0.00	0.00	0.00

Housing Development Programs that the MTW Agency plans to spend funds on in the Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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D.	Safe Harbor Waivers.
D.1	<p>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</p> <p>No Safe Harbor Waivers are being requested.</p>

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</p> <p>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p>No Agency-Specific Waivers are being requested.</p>
E.2	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>Does the MTW agency have any approved Agency-Specific Waivers?</p> <p>MTW Agency does not have approved Agency-Specific Waivers</p>

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2021	\$4,006,477	\$4,006,477	\$0	2022-12-31
2023	\$4,728,443	\$4,728,443	\$0	2023-12-31

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.
Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency? No	
Please describe the MTW agency's plans for its future rent reform activity and the implementation timeline.	

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

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

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix" of families by family	

size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.

Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	
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.

I.	Evaluations.
	Yes - This table lists evaluations of Housing Authority Of The City Of Norwalk's MTW activities, including the names of evaluators and available reports

Table I.1 - Evaluations of MTW Policies

Title and short description	Evaluator name and contact information	Time period	Reports available
HUD's Moving to Work (MTW) Landlord Incentives Evaluation-site visit	Philip ME Garboden, 215 880-7715	September 13, 2023	None

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.

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

Impact Analysis – Activity 2.b. Payment Standards – Fair Market Rents (FMR)

		HCV
1.	Impact on the agency’s finances (e.g., how much will the activity cost, any change in the agency’s per family contribution)	This activity is expected to reduce administrative costs by reducing tenant turnover and inspection needs and increase HAP expenditures.
2.	Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)	Increases affordability through increased payment standards so affected families will have more housing options.
3.	Impact on the agency’s waitlist(s) (e.g., any change in the amount of time families are on the waitlist)	None, increasing the payment standards as described in our plan should not have any impact of the amount of time families are on the waitlist.
4.	Impact on the agency’s termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)	We do not anticipate the payment standard increase will result in any impact on the termination rate of families, since it will not affect factors which primarily cause termination and will increase housing affordability for families.
5.	Impact on the agency’s current utilization rate in the HCV program	Utilization will increase through increased family choice in units. By increasing the payment standards in areas of higher opportunity, voucher holders will have increased options for where to rent and more easily find units.
6.	Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency and/or housing choice	Increased payment standards implemented in higher cost areas increase family housing choice. Opportunities for families in higher opportunity neighborhoods may also increase self-sufficiency over time.
7.	Impact on the agency’s ability to meet MTW statutory requirements	Increased payment standards will increase housing choices for low-income families by enabling them to move to higher opportunity areas. They will also increase self-sufficiency, as residents will be able to move to areas of higher opportunity with more access to community resources, of job training, transportation and employment. Cost effectiveness will also be increased as increased self-sufficiency will long-term result in decreased HAP payments and a decrease in administrative work as fewer tenants will need to move due to rent increases.
8.	Impact on the rate of hardship requests and the number granted and denied as a result of this activity	No impact on the rate of hardship requests presented or denied are anticipated as payment standards will be increased not decreased.
9.	Impact on protected classes (and any disparate impact)	This activity will apply equally to all HCV voucher holders and should have no disparate impact on protected classes, and access to units in higher opportunity areas may have a positive impact.

Impact Analysis – Activity 3.a,b- Alternative Reexamination Schedules for Households

		HCV
1.	Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)	This activity is expected to reduce administrative costs by reducing staff time devoted to annual recertifications.
2.	Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)	No impact is expected
3.	Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)	None
4.	Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)	No impact is expected
5.	Impact on the agency's current utilization rate in the HCV program	No impact is expected
6.	Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency and/or housing choice	This activity is expected to meet the MTW statutory goal of increased cost effectiveness by reducing staff time devoted to annual recertifications.
7.	Impact on the agency's ability to meet MTW statutory requirements	This activity is expected to reduce administrative costs by reducing staff time devoted to annual recertifications.
8.	Impact on the rate of hardship requests and the number granted and denied as a result of this activity	No impact on the rate of hardship requests presented or denied are anticipated as any resident whose income decreases will have the right to request an immediate rent redetermination.
9.	Impact on protected classes (and any disparate impact)	This activity will apply equally to all households with only fixed income sources. This will disproportionately affect seniors and people with disabilities who are more likely to live on fixed income sources, however, the impact should be positive, by reducing the paperwork burdens on these residents from annual rental redeterminations to tri-annual recertifications and allowing them to retain COLA increases without rent increases in between the recertifications.

October 19, 2023 Resident Advisory Board Meeting & Advocates
Meeting Agency Response to Public Comments

1. What is a project based voucher?
 - A. **A project based voucher is a section 8 voucher that is tied to a particular unit and the tenant in that unit, rather than a housing choice voucher which is tied to a tenant who can take the voucher and rent any suitable unit in the private market.**

2. How often do annual inspections find violations that otherwise would have been missed?
 - A. **Not often, more often violations are found in special inspections requested by the residents.**

3. Are these new plans done based on things other agencies have done that have worked in the past?
 - A. **The Moving to Work program is designed to let us try new things, so often there is less evidence of what has worked in the past, because we are trying things other housing authorities cannot do through our waivers. However, we have talked to older moving to work housing authorities with more experience and modified some of our plans based on what they said were issues for them in the past and changes they had to make to make things work smoothly.**

October 19, 2023 Resident Advisory Board Meeting & Advocates
Meeting Public Comments

1. What is a project based voucher?
2. How often do annual HQS inspections find violations that otherwise would have been missed?
3. Are these new plans done based on things other agencies have done that have worked in the past?

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 (01/04/24 _____), 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 D. Bovilsky

Secretary of the Board

NAME OF AUTHORIZED OFFICIAL

TITLE


SIGNATURE

1/16/2024
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.**