

PHA Name : Pocatello

PHA Code : ID005

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2023

PHA Program Type: Combined

MTW Cohort Number: MTW Flexibility for Smaller PHAs

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

As HACP moved into FY2023, our goal was to increase Cost Effectiveness in Federal Expenditures by implementing a Flat Rate Utility Allowance that takes in to account the number of bedrooms each unit has and base the Utility Allowance strictly on the number of bedrooms. HACP also increased the Payment Standards by 110% from the current FMR's as an incentive to our working families to achieve Self-Sufficiency as well as help them to secure units by having more buying power. HACP also went to Biennial Inspections, to help reduce the costs for those participants who passed their Initial Inspection as well as their first Annual Inspection, there by reducing costs to the agency and encouraging our participants to report their issues to their landlords and our landlords to do repairs.

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)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
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)	Currently Implementing
j. Alternative Utility Allowance (HCV)	Currently Implementing
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
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)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	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)	Currently Implementing
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)	Not Currently Implemented
b. Alternative Reexamination Schedule for Households (HCV)	Not Currently Implemented
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)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Not Currently Implemented
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)	Currently Implementing
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. MTW Activities Plan that Pocatello Plans to Implement in the Submission Year or Is Currently Implementing**1.i. - Alternative Utility Allowance (PH)****Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

HACP is choosing to use one standard flat utility allowance per bedroom size. The utility allowances are determined by using the average utility allowance per number of bedrooms per unit size and rounding to the nearest dollar. The utility allowances will be reviewed annually and will be adjusted based on rate changes. Public Housing has 0-bedroom units and 1-bedroom units, only. This use of flat rate Utility Allowances has greatly reduced not only the Administrative Burden but has directly affected Cost Effectiveness.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

HACP has moved to a flat UA based on the number of units that are one-bedroom and the number of units that are zero-bedrooms. The flat rate amount has been arrived at the number of bedrooms per unit size and rounding to the nearest dollar. This MTW goal will allow the tenants to pay an expected rate so that they are able to budget their funds accordingly.

Safe Harbor

1.i. and 1.j.

i. The utility schedule must be based upon number of bedrooms, the property location, and/or the types of utilities paid by participant.

ii. The agency must review its schedule of utility allowances each year and revise its allowance for a utility category if there has been a change of 10 percent or more of the cost from the prior year. The agency must maintain information supporting its annual review of utility allowances and any revisions made in its utility allowance schedule.

iii. The agency must not include items in the utility schedule that are excluded under HUD regulations.

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

No

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

The standard method of calculating Utility Allowances was to have an outside agency review the information provided and to establish a UA based on the attributes of each unit. The flat rate UA's allows HACP to reduce their costs, do the work in-house, and give the tenants the opportunity to have a flat rate to be able to budget their payments. The utility allowances are determined by using the average utility allowance per number of bedrooms per unit and rounding to the nearest dollar. The utility allowances will be reviewed annually and will be adjusted based on rate changes.

1.j. - Alternative Utility Allowance (HCV)

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

The calculations for utility allowances are very complicated and require staff to spend a great deal of time educating landlords and participants about how they work and how they affect choices in units. To simplify this, HACP is choosing to use one standard utility allowance per bedroom size regardless of tenant utility responsibility. The utility allowances are determined by using the average utility allowance per number of bedrooms per unit and rounding to the nearest dollar. The utility allowances will be reviewed annually and will be adjusted based on rate changes. For bedroom sizes greater than five bedrooms, an additional allowance of 15% per bedroom will be added.

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.

Increased revenue; Decreased expenditures

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

The MTW activity applies to all assisted households

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

The implementation of the flat rate Utility Allowance has proven to be a cost saver. Tenants new to the program have a easier time understanding their affordability when looking for a unit. Landlords have an easier time understanding the affordability when screening applicants whom are using a voucher. The flat rate UA does include all of the possible UA costs but still seem to be slightly lower then the previous utility allowances. The overall customer satisfaction has increased.

Safe Harbor 1.j.

- i. The utility schedule must be based upon number of bedrooms, the property location, and/or the types of utilities paid by participant.
- ii. The agency must review its schedule of utility allowances each year and revise its allowance for a utility category if there has been a change of 10 percent or more of the cost from the prior year. The agency must maintain information supporting its annual review of utility allowances and any revisions made in its utility allowance schedule.
- iii. The agency must not include items in the utility schedule that are excluded

under HUD regulations.

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

No

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

The utility allowances are determined by using the average utility allowance per number of bedrooms per unit and rounding to the nearest dollar. The Standard Method simply asks the participant to pay whatever utilities the LLD is asking them to, The Flat Rate Utilities gives them the opportunity to make better choices in the housing stock, as well as gives the landlord the opportunity to approve the participant of their choice. The utility allowances will be reviewed annually and will be adjusted based on rate changes . For bedroom sizes greater than five bedrooms, an additional allowance of 15% per bedroom will be added.

2.b. - Payment Standards- Fair Market Rents (HCV)**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

HACP plans to increase the voucher payment standard to 110% for all voucher holders for Fiscal Year 2023. The 110% of the current FMR's will take effect on July 1, 2022, which is the start of HACP's Fiscal Year. The current Payment Standards are not keeping up with the current Market Rents, and by raising the Payment Standards to 110%, our landlords are more likely to approve a voucher holder, this action will give our participants and new admissions more shopping power to be able to keep up with the climbing rents and utilities. This action may also help our participants go back to school or seek employment. The potential for Self Sufficiency is also a possibility.

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

Self-sufficiency; 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.

In FY2022, the payment standards were set at 110% of published FMR's, however on 1/1/2023 it became clear that HACP needed to move to 120% of the FMRs. This had an overall effect on the program success rate on leasing up. FY 2023, the FMR's were set at 110%. and then at 120%. The most noticeable effect is the number of applicants leasing up in place as well as a quicker lease up time, many at the 30-day mark., HACP has also been able to approve rental increases that fall in line with current rental prices, with having little effect on the tenants portion.

Safe Harbor 2b

i .Payment standard must be between 80% and 120% of the FMR.

ii Agency must implement an impact analysis.*

iii. Agency must implement a hardship policy.*

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?

No

Please explain the payment standards by FMR:

The payment standards have been increased to 120% of the FMR on 1/1/2023
0-Bedroom; FMR is equal to \$599.00 - Current Payment Standard is \$715.00
1-Bedroom: FMR is equal to \$681.00 - Current Payment Standard is \$815.00
2-Bedroom FMR is equal to \$896.00 - Current Payment Standard is \$1,060.00
3-Bedroom FMR is equal to \$1,273.00 - Current Payment Standard is \$1525.00
4-Bedroom FMR is equal to \$1,526.00 - Current Payment Standard is \$1,830.00
5-Bedroom FMR is equal to \$1,865.00 - Current Payment Standard is \$2,100.00
6-Bedroom FMR is equal to \$1,982.00 - Current Payment Standard is \$2,375.00

5.d. - Alternative Inspection Schedule (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

Starting FY2023, HACP will adopt a Biennial Inspection Schedule. Units that have a good inspection history, of at least two consecutive passing inspections, may be eligible for a biennial inspection schedule at the discretion of HACP. In order to be eligible for biennial inspection, the previous inspection must have had zero life-threatening fails and less than five non-life-threatening fails that were later corrected. Tenants occupying units with a biennial inspection schedule may request an inspection as needed if any problems with the unit arises. This activity will also allow for the self-certification of units that had ten or less non-life-threatening fails in lieu of a reinspection. The tenant and the owner or landlord must certify that the needed repairs have been made. Additionally, photos and invoices must be submitted within 30 days to HACP. These steps must be completed before a Housing Assistance Payment contract can be executed.

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.

Increased revenue; Decreased expenditures

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

The MTW activity applies to all assisted households

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

Due to the biennial schedule during FY2022, HACP was able to reduce one FTE (by attrition). The other advantage is that the Maintenance Team has skills and in some cases can help the landlord repair a minor deficiencies at the time of the inspection, decreasing the number of failed inspections. This is an incentive for landlords by providing good customer service and moving the process along for new move ins and no interruption in subsidy for current participants.

Safe Harbor 5d

- i. Units must be inspected at least once every three years.
- ii. The participant must be able to request an interim inspection.*

- iii. HQS inspection standards as found at 24 CFR982.401 must not be altered. *
- iv. The Department must be able to conductor direct the agency to perform an inspection at any time for health and safety, as well as accessibility, purposes. *

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

No

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</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? No</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	\$158,139	\$158,139	\$0	2021-12-31
2022	\$134,183	\$134,183	\$0	2022-12-31
2023	\$143,178	\$35,794	\$107,383	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	0
	49%-30% Area Median Income	0
	Below 30% Area Median Income	0
	Total Local, Non-Traditional Households	0

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

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

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

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

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

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

H.	Public Comment
	Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.
	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 (July 1 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.

Housing Alliance and Community Partners

ID005

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).

Karina Mason

Board Chair

NAME OF AUTHORIZED OFFICIAL

TITLE

4.11.2022

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.*



HACP Hardship Policy for Move to Work Activities

Introduction:

This document contains information regarding hardship exemptions for those who are excessively impacted by Move to Work activities. This policy includes applicable family situations, process for agency review and determination, resident notification, grievance procedure, reasonable accommodations, and record keeping. A copy of this policy must be provided to each household at the time of implementation, certification, and recertification. The HACP Hardship Policy is designed to address Rent Reform Activities:

- Elimination of Deductions
- Minimum Rents
- Utility Allowances
- Triennial Certifications for Elderly and Disabled

All hardship requests must be made in writing, stating both the reason for the hardship and the expected duration. The result of the review may result in referral to other local resources or an adjustment in the portion of the family's rent.

Applicable Family Situations

In addition to the criteria listed under each rent reform activity for hardship exemption eligibility, households may seek a hardship exemption for one or more of the following reasons: illness, injury, accident, a single adult household whose head of household is a caretaker to a child under 18 months, death in the household, change in household composition, or loss of work due to a lay-off or reduction in force. Length of hardship exemption will vary depending upon each event as outlined here. Households in these situations will be encouraged to work with the Network Navigator to find appropriate community resources and training.

- Illness, injury, or accident that precludes work
 - The household may receive hardship exemption through the length of the event. Households must include relevant documentation with hardship exemption requests such as notes from physicians, workers compensation claims, etc.
- Single Adult Household Caretaker of a Child under 18 Months Old
 - HACP recognizes the difficulty and cost of obtaining child care for a child under 18 months old as well as the importance of interaction and bonding with parental figures. Because of this, hardship exemptions are available for single adult households where the head of household is also the primary caretaker of a child under 18 months old. This exemption is available until 30 days after the child reaches 18 months of age.

- Death in Household and Change in Household
 - The household may receive a hardship exemption for up to 6 months.
- Loss of Work
 - The household may receive a hardship exemption for up to 6 months if the loss of work occurred due to good cause. Good Cause would be defined as reduction in force or lay offs.

Elimination of Deductions, Minimum Rent, and Utility Allowances

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

- The household is in compliance with all program rules and regulations.
- The household does not owe HACP any money or is current with a re-payment agreement.
- The household must be admitted to the program prior to March 1, 2022.
- The household has not relocated on or after March 1, 2022.
- The household must experience an increase of \$25.00 or more in rent as a direct result of the MTW rent reform initiatives.
- The household requested a hardship waiver within the deadline set by HACP. Households have 10 business days from the date of their “Notice of Change” letter in which to request an Informal Hearing and/or Hardship Review.
- The household has not previously received a hardship exemption in the past two years for elimination of deductions.

Process for Agency Review and Determination

Households who meet the above criteria may mail, fax, or email their request to HACP. When a household requests a hardship exemption, the MTW activity will be suspended beginning the next month after the request until HACP has determined if the request is warranted. *If the request does not meet the hardship standards, HACP will resume the MTW activity and collect any retroactive rent using a repayment plan.*

If the request does meet the hardship standards, the agency must continue to provide an exemption from the MTW activity at a reasonable level and duration, according to the agency’s written policies. The request will be reviewed promptly by a housing programs specialist and make an appropriate determination and referrals as necessary. The specialist will then forward the request with their determination to a supervisor who will review and approve the determination. If the determination is not approved, the supervisor will work with the specialist, the household as needed, and the executive director for additional information or adjustments.

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 rent reform initiatives.

Note: Each household is only eligible for one term of relief in a two year period for each rent reform initiative and if the household qualifies for more than one relief at any given recertification (annual or interim), the reliefs will be calculated concurrently. However, there is not a limit on

hardship exemptions based upon illness, injury, accident, a single adult household whose head of household is a caretaker to a child under 18 months, death in the household, change in household composition, or loss of work due to a lay-off or reduction in force.

Resident Notification

Each household will receive a copy of this hardship policy at the time of initial implementation, certification, and each recertification. At certifications and recertifications, caseworkers will go over the policy and allow households to ask questions and households will sign confirming that they received a copy of this policy and understand the policy. This policy may be requested at any time, and it will be available on HACP's website as well as in the HACP's office lobby.

Grievance Procedure

In the event that a request for a hardship request is denied, households may request an additional review of their request from the executive director of HACP. A decision reached by the executive director will be final.

Reasonable Accommodations

HACP provides reasonable accommodations to individuals with disabilities consistent with the Section 504 Final Rule (24 CFR Part 8) & the Fair Housing Amendments Act.

Record Keeping

HACP will retain records of hardship exemption requests, supporting documentation, and determinations consistent with HUD requirements and regulations.

The following will analyze the impact of a Payment Standard Waiver of taking the current Payment Standard to 110% of the FMR.

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

Yes, this activity will cost the agency approximately 10% more than it would have cost at 100%. For instance, one of our participants was paying \$214.00 in Tenant Rent in 2022; 2022 was also set at 110% of the FMR, with the increase in the FMR as well as the 110% of the FMR for 2023 our participant is now paying \$167.00 with a small increase in income. On January 1, 2023 HACP decided to make a change in the amounts of the Payment Standards and went to 120% of the current FMRs. One of our tenants and in their 2022 Annual, paid \$287.00 – in January of 2023 they paid \$272.00 with no loss of income.

2. Describe the activity's impact on affordability of housing costs for affected families. (e.g. any change in how much affected families will pay towards their housing costs)

With the increased Payment Standards our participants will be able to afford to pay a higher amount of rent. Based on the most recent costs of rentals in Pocatello and running the Rent Reasonable requirement it appears that their affordability has increased enough to allow them to rent a varied number of units.

3. Describe the impact on the agency's wait list(s) (e.g. any changes in the amount of time families are on the wait list)

The idea is that by increasing the amount of purchasing power and shortening the shopping time based on the increased affordability that this will have a direct effect on the Waitlist.

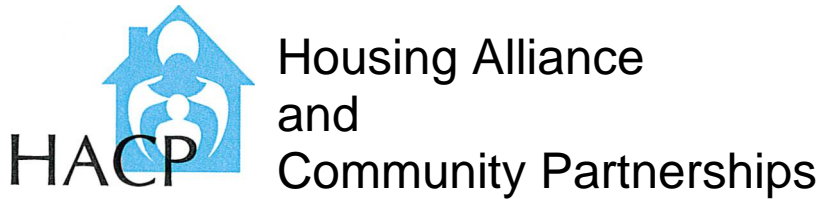
4. Describe the impact on the agency's termination rate of families (e.g. any change in the rate at which families non-voluntarily lose assistance from the agency)

Although many terminations have to do with non-compliance with the HCV Program, there may be a positive effect on individuals who do pay their rent timely. This in turn may reduce the number of terminations.

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

The Payment Standards being increased will have no effect on our Public Housing participants. However, in the HCV Program, the Payment Standards being increased will have a significant impact on our utilization rates as the shopping amounts will be higher, the ability to pay rent will be higher, and overall, it potentially will put more funds in their pockets to help with family needs.

- 6. Describe the impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice.** The initial cost effectiveness will cost the agency more money, however in the long run the idea is to put more vouchers on the street and allow HACP to increase voucher holders. Housing choice is the next big impact, as it will allow our participants to find housing, pay less Tenant Rent, and hopefully enhance their family life. The hope is that the increased payment standards will give our participants a glimpse of what self-sufficiency looks like and they will move forward in a positive direction and toward self-sufficiency.
- 7. Describe the impact on the rate of hardship requests and the number granted and denied as a result of this activity** HACP has had no Hardship Requests in the last few years. However, the thought is that with an increased payment standard the Hardship Requests will not be requested at the same rate.
- 8. Across the other factors above, describe the impact on protected classes (and any associated disparate impact)** HACP does not anticipate any negative impact on protected classes as we give the same Payment Standards across the entire list of participants. HACP pulls from a waitlist that is from date and time of application only; this practice talks to anonymity to whom we are pulling from our waitlists.



HACP met with RAB, the City of Pocatello, CDBG, Idaho State University, and other local agencies. Its clear that Pocatello has employment issue. Rents have continued to skyrocket over the past 12 months. At the beginning of FY2022, HACP had 211 people on the HCV waitlist. As of December 31, 2022, there were 656 applicants on the waiting list. This is an indication that Pocatello is becoming unaffordable for lower income families and wages are not keeping up. The community is hoping the skills center will help connect families with the resources to increase employment and educational opportunities.

Pocatello is a college town, and for Idaho residents, the tuition is still affordable. ISU has an amazing program to anyone, of all ages to support them in navigating higher education. HACP and ISU realize how important is to help these students in way possible, so they have a successful start to an education. We also agree that the skill and development center is a suitable place to start with the soft skills to facilitate the This will be beneficial for young adults who are graduating from high school and have not planned or do not have the resources to attend school.

The administrative changes will free up HACP staff time to work with families who want to increase their income and remove the barriers that have kept them income challenged and at the poverty level.

HACP received one comment from the public, which you will find attached to the Public Comment section.

ADVERTISING RECEIPT

APG West Payment
 Processing
 PO Box 1570
 Pocatello, ID 83204
 Ph. (208) 239-3163

BILLING DATE:	ACCOUNT NO:
02/07/23	1494

**Housing Alliance and
 Community Partnerships
 Notice of Public Comment
 Period.**

Sarah
 HOUSING ALLIANCE AND COMMUNITY PART-
 NERSH
 711 N 6TH
 POCATELLO, ID 83201

Place: Housing Alliance and
 Community Partnerships Ad-
 ministrative Office, 711 N. 6th
 Ave, Pocatello. City Hall; 911
 N. 7th Ave, Pocatello. Public
 Library, 113 Garfield Ave, Po-
 catello.

Notice is hereby given that
 the Housing Alliance and
 Community Partnerships will
 receive comments from the
 public concerning the pur-
 posed Annual Strategic Plan/
 MTW Plan and Capital Fund.
 The Plan is available for pub-
 lic review February 5, 2023 to
 March 22, 2023 at the location
 listed above.

Comments may be made
 to the Housing Alliance and
 Community Partnerships at
 HACP.board.director@gmail.
 com or by attending an in
 open meeting on March 7th at
 10:00am to 11:00 am.

**Published: February 10, 17,
 24, 2023 (ISJ1494-332620)**

AD #	DESCRIPTION	START	STOP	TIMES	AMOUNT
332620	Housing Alliance and	02/10/23	02/24/23	3	\$68.36

Payments:

Date	Method	Card Type	Last 4 Digits	Check	Amount
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Discount:	\$0.00	Gross:	\$68.36
Surcharge:	\$0.00	Paid Amount:	\$0.00
Credits:	\$0.00		

Amount Due: \$68.36

We Appreciate Your Business!

Public Comments

I saw this 2023 HACP annual report and I'm curious if the availability of (unused) housing choice vouchers is about a lack of rental housing or more about the landlords/owners not wanting to participate in the program. I suppose the two go hand-in-hand because if there is demand for housing, they have no trouble finding tenants. Just not sure how to help fix this. I know they are building a lot of apartments (more so in Chubbuck). But, they seem to be high rent apartments. I've been watching the newer Northgate apartment's website and they have ranged from around 30-40 vacancies (that's still probably good occupancy as I think they have close to 400 units.) But, I had thought by building these types of projects, it might ease up vacancies and/or rents in the older sections of town. The last HACP update to Council was given by a woman who is a retired bank executive. I am nnot sure if she is their permanent or interim CEO. She didn't seem to know much (imo) and couldn't answer some of their questions. Anyway, no pressure to respond - I'll understand if you prefer not to. I tend to think about issues like these and wonder how (the public) can help push for improvements to bring about better housing security.

Enter



RAB Meeting

February 2, 2023, at 2:00 PM in the Christensen Court Community Room.

Those in attendance; Shanda Hansen, Ross Coordinator, Sarah Van Cleve, HACP representative, residents; [REDACTED]
[REDACTED]

Reviewed last year's ask; New patio furniture was purchased. There was a plan to offer some in house carpet replacement but that was not offered was not put out in 2023. The sidewalks were redone, and railings were painted. There is some concern with how slippery they get when it rains and snows. The elevator fix has not happened and it's putting extra pressure on the other one. Tenants are concerned that in case of emergency having only one elevator, there will be issues. There is still an issue with tenants putting personal stuff on the walkways and blocking access.

Security Discussion: the residents are very concerned about security. The doors on the end of the building are not secured. Anyone can come on site at any time and there are not enough cameras in the right place. We talked about putting up "Ring" cameras on each unit, so tenants could see how was outside their units.

Annual Plan: There were a lot of internal changes with management and staff. Covered a little on the HCV program and increasing the number of families on the program. Covered the capital needs scheduled for FY 2025, much scheduled work is around the MTW program. Windows on the inside of the building have not been completed.

MTW: Due to technical difficulties with a new program (HIP), HACP was not able to implement the administrative flexibilities for completing rent calculations each year. In 2024 HIP will be available and HACP will implement the changes approved in the original plan (27% TTP, no deductions or expense, and biennial income reviews and unit inspections). The tenants were glad to know HACP was implementing that change. **Skill Center: The tenants were very interested in when the computer lab would be available. They came up with some ideas for classes to be offered.**

Npsire inspection; Talked about the new criteria for the inspection process when Christensen Court will be inspected (2025) There will be items that inspectors will be looking at. Prior to the inspection HACP will ensure that all units are Npsire ready.

This year's ask:

- Repair the elevator as soon as possible.
- Something done about the sidewalks being so slippery: add grit to the paint surface.
- Build up the resident pantry started in 2023.
- Vending Machine with some healthy and sweet snacks.
- Classes offered at the Skill Center: Financial planning and estate planning; legal access for wills, DOR and other personal resources; smart phone training, cyber awareness training, photo shop class.

- Craft classes taught by residents.