

PHA Name : Pocatello

PHA Code : ID005

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

PHA Program Type: Combined

MTW Cohort Number: 1

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

Housing Authority and Community Partnerships (HACP) intends to use Move to Work flexibility to benefit the Public Housing Authority (PHA), as well as our employees, residents, and community. The following plan will create efficiencies that will achieve greater cost-effectiveness in our programs, incentivize and support working families to become more economically self-sufficient, and increase housing choices for low-income families.

To increase cost-effectiveness and staff efficiency, we will eliminate deductions, establish minimum rents, simplify utility allowance calculations, streamline the inspections process, and adjust our disabled and elderly eligibility certifications to a triennial schedule. This will not only speed up the intake process when new families come off our waitlists, but will also create efficiencies up to \$76,000.

To incentivize and support working families we will be opening and running the Skills Development Center, which will host courses and services for money, life, and job skills. This project is supported by various community partners, by providing curriculum, volunteering staff, and providing financial support. We will provide financial and material incentives for participants in the Skills Development Center programs, as well as separate income-related incentives for students and young adults to work, build independence, and acquire job skills. We anticipate these programs to cost \$35,000. Financially, this will be supported via CDBG grant money, and the cost efficiencies saved in other programs.

We believe the new efficiencies will help us retain our relationships with current participating property management, and improve our relationship with property managers who dislike the time it takes to lease a new resident. We also have specific landlord incentives to promote renting to low-income families on our waitlists. These include vacancy loss and damage mitigation funds, as well as a lease-up incentive; these will cost \$69,000, but are also financially supported by grants and cost efficiencies. We also intend to open up a skills and development center next door to the main office. We have partnered with local employers to teach soft skills, and Idaho State University for pathway for higher education. The United Way has been vital to the creation of these partnerships and drafting the MOA's and reaching out other service providers to add additional resources.

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

1. Tenant Rent Policies	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Plan to Implement in the Submission Year
f. Minimum Rent (HCV)	Plan to Implement in the Submission Year
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Plan to Implement in the Submission Year
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Plan to Implement in the Submission Year
i. Alternative Utility Allowance (PH)	Plan to Implement in the Submission Year
j. Alternative Utility Allowance (HCV)	Plan to Implement in the Submission Year
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Plan to Implement in the Submission Year
n. Utility Reimbursements (HCV)	Plan to Implement in the Submission Year
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Plan to Implement in the Submission Year
s. Elimination of Deduction(s) (HCV)	Plan to Implement in the Submission Year
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Plan to Implement in the Submission Year
w. Alternative Income Inclusions/Exclusions (HCV)	Plan to Implement in the Submission Year
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Plan to Implement in the Submission Year
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
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
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)	Plan to Implement in the Submission Year
b. Damage Claims (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Plan to Implement in the Submission Year
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
d. Alternative Inspection Schedule (HCV)	Plan to Implement in the Submission Year
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)	Plan to Implement in the Submission Year
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Plan to Implement in the Submission Year
d. Alternative PBV Selection Process (HCV)	Plan to Implement in the Submission Year
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)	Plan to Implement in the Submission Year
b.HCV Policies for Addressing Increases in Family Income (HCV)	Plan to Implement in the Submission Year
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.e. - Minimum Rent (PH)
HACP will establish a minimum rent amount for all non-elderly and non-disabled households with the expectation that everyone who is able-bodied should contribute to their own housing costs. This amount is found using the following calculation: $((\text{Minimum wage} \times 15 \text{ hours} \times 52 \text{ weeks}) / 12 \text{ months}) \times 27\%$. The minimum wage is currently \$7.25 in the area that HACP serves, however, this policy allows for automatic adjustment based upon federal, state, or local adjustments to minimum wage. HACP will round down to the nearest dollar. For 2021-2022, this results in a minimum rent amount of \$127. If a recipient is not able to pay for the amount of minimum rent, they may seek a hardship exemption. Hardships could be caused by one of the following: illness, injury, accident, a single adult household whose head of household is a caretaker to a child under 18 months, death in the household, or loss of work due to a lay-off or reduction in force. Additionally, recipients can elect to participate in the MTW self-sufficiency training and courses to get a waiver of minimum rent for up to one year during the beginning of their participation. Participation is defined as meeting with the network navigator quarterly in addition to attending training and courses as applicable to the recipient's set goals and plans. By establishing a minimum rent, we are hoping to encourage heads and coheads of households to improve their overall financial well-being, whether that's by increasing work, increasing pay and professional competitiveness, or by adhering to an effective budget. This activity will also make funds available for HACP to help more families and keep up with increasing housing costs.
This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency
This MTW activity serves the following statutory objectives: Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types
This is a new activity.
This MTW activity requires a Safe Harbor Waiver. The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).
This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
Attached Hardship policy applies to: 1.e. - Minimum Rent (PH) 1.f. - Minimum Rent (HCV) 1.g. - Total Tenant Payment as a Percentage of Gross Income (PH) 1.h. - Total Tenant Payment as a Percentage of Gross Income (HCV) 1.r. - Elimination of Deduction(s) (PH) 1.s. - Elimination of Deduction(s) (HCV) 3.a. - Alternative Reexamination Schedule for Households (PH) 3.b. - Alternative Reexamination Schedule for Households (HCV)}
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pocatello MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
The Impact Analysis that applies to this MTW activity also applies to the following MTW activities: 1.e. - Minimum Rent (PH) 1.f. - Minimum Rent (HCV)
minimum rent or minimum Total Tenant Payment (TTP) - \$127

1.f. - Minimum Rent (HCV)
<p>HACP will establish a minimum rent amount for all non-elderly and non-disabled households with the expectation that everyone who is able-bodied should contribute to their own housing costs. This amount is found using the following calculation: $((\text{Minimum wage} \times 15 \text{ hours} \times 52 \text{ weeks}) / 12 \text{ months}) \times 27\%$. The minimum wage is currently \$7.25 in the area that HACP serves, however, this policy allows for automatic adjustment based upon federal, state, or local adjustments to minimum wage. HACP will round down to the nearest dollar. For 2021-2022, this results in a minimum rent amount of \$127.</p> <p>If a recipient is not able to pay for the amount of minimum rent, they may seek a hardship exemption. Hardships could be caused by one of the following: illness, injury, accident, a single adult household whose head of household is a caretaker to a child under 18 months, death in the household, or loss of work due to a lay-off or reduction in force.</p> <p>Additionally, recipients can elect to participate in the MTW self-sufficiency training and courses to get a waiver of minimum rent for up to one year during the beginning of their participation. Participation is defined as meeting with the network navigator quarterly in addition to attending training and courses as applicable to the recipient's set goals and plans.</p> <p>By establishing a minimum rent, we are hoping to encourage heads and coheads of households to improve their overall financial well-being, whether that's by increasing work, increasing pay and professional competitiveness, or by adhering to an effective budget. This activity will also make funds available for HACP to help more families and keep up with increasing housing costs.</p>
<p>This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency</p>
<p>This MTW activity serves the following statutory objectives: Decreased expenditures</p>
<p>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households</p>
<p>This MTW activity applies to: New admissions and currently assisted households</p>
<p>An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types</p>
<p>This MTW activity applies to the following housing choice voucher unit types: This activity applies to all non-elderly and non-disabled families, regardless of voucher type.</p>
<p>This is a new activity.</p>
<p>This MTW activity requires a Safe Harbor Waiver. The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).</p>
<p>This MTW activity requires a Hardship Policy. The Hardship Policy is attached.</p>
<p>No hardship were requested in the most recent fiscal year.</p>
<p>In the prior year, under this activity, Pocatello MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.</p>
<p>This MTW activity requires an Impact Analysis. The Impact Analysis is attached.</p>
<p>minimum rent or minimum Total Tenant Payment (TTP) - \$127</p>

1.g. - Total Tenant Payment as a Percentage of Gross Income (PH)
<p>Due to the elimination of deductions, we are decreasing total tenant payment as a percentage of gross income from 30% to 27% in the case that this amount is higher than minimum rent (\$127). This will reduce hardship on families caused by activities 1.r and 1.s. This is subject to the same impact analysis and hardship policy as 1.r and 1.s: Elimination of Deductions.</p>
<p>This MTW activity serves the following statutory objectives: Self-sufficiency</p>
<p>This MTW activity serves the following statutory objectives: Increased expenditures</p>

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types
This is a new activity.
This MTW activity requires a Safe Harbor Waiver. The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).
This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pocatello MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
Percentage of income will equal 27.00% of the Total Tenant Payment (TTP)
Income basis for calculating Total Tenant Payment is : This activity uses a different definition of income because we are using the following MTW waivers (check all that apply) 1.r. and/or 1.s. "elimination of deductions" 1.v. and/or 1.w "alternative inclusions and exclusions"

1.h. - Total Tenant Payment as a Percentage of Gross Income (HCV)
Due to the elimination of deductions, we are decreasing total tenant payment as a percentage of gross income from 30% to 27% in the case that this amount is higher than minimum rent (\$127). This will reduce hardship on families caused by activities 1.r and 1.s. This is subject to the same impact analysis and hardship policy as 1.r and 1.s: Elimination of Deductions.
This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency
This MTW activity serves the following statutory objectives: Increased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types
This MTW activity applies to the following housing choice voucher unit types: This activity applies to all non-elderly and non-disabled households, regardless of voucher type
This is a new activity
This MTW activity requires a Safe Harbor Waiver. The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).
This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pocatello MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.

Percentage of income will equal 27.00% of the Total Tenant Payment (TTP)

Income basis for calculating Total Tenant Payment is :

This activity uses a different definition of income because we are using the following MTW waivers (check all that apply)

1.r. and/or 1.s. "elimination of deductions"

1.v. and/or 1.w "alternative inclusions and exclusions"

1.i. - Alternative Utility Allowance (PH)

The calculations for utility allowances are very complicated and require staff to spend a great deal of time educating landlords and recipients about how they work and affect choices in units. To simplify this, HACP is choosing to use one standard utility allowance per bedroom size regardless of tenant utility responsibility. Additionally, utility reimbursement checks or payments will not be issued. Instead, the utility allowance will be applied to the amount of rent that individuals or families are required to pay; thereby increasing their HAP amount up to \$0 tenant rent. 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.

By simplifying the utility allowance and not issuing reimbursements or payments, we will be able to create administrative efficiency by eliminating the need to print and mail checks for this. This directly reduces administrative costs including human labor, printing, and postage. We also hope that this activity will result in increased housing choice by eliminating a difficulty that landlords often have.

This MTW activity serves the following statutory objectives:

Cost effectiveness

Housing choice

This MTW activity serves the following statutory objectives:

Increased expenditures

Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households

This is a new activity.

This MTW activity requires a Safe Harbor Waiver.

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Pocatello MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

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. This year utility allowances will be:

0 Bedroom/Studio: \$47

1 Bedroom Unit: \$56

2 Bedroom Unit: \$79

3 Bedroom Unit: \$113

4 Bedroom Unit: \$140

5 Bedroom Unit: \$236

1.j. - Alternative Utility Allowance (HCV)

The calculations for utility allowances are very complicated and require staff to spend a great deal of time educating landlords and recipients about how they work and affect choices in units. To simplify this, HACP is choosing to use one standard utility allowance per bedroom size regardless of tenant utility responsibility. Additionally, utility reimbursement checks or payments will not be issued. Instead, the utility allowance will be applied to the amount of rent that individuals or families are required to pay; thereby increasing their HAP amount up to \$0 tenant rent. 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.

By simplifying the utility allowance and not issuing reimbursements or payments, we will be able to create administrative efficiency by eliminating the need to print and mail checks for this. This directly reduces administrative costs including human labor, printing, and postage. We also hope that this activity will result in increased housing choice by eliminating a difficulty that landlords often have.

This MTW activity serves the following statutory objectives:

Cost effectiveness
Housing choice

This MTW activity serves the following statutory objectives:

Increased expenditures
Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households

This is a new activity.

This MTW activity requires a Safe Harbor Waiver.

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Pocatello MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

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.

0 Bedroom/Studio: \$47

1 Bedroom Unit: \$56

2 Bedroom Unit: \$79

3 Bedroom Unit: \$113

4 Bedroom Unit: \$140

5 Bedroom Unit: \$236

1.m. - Utility Reimbursements (PH)

Due to the changes in utility allowance, we are ceasing utility reimbursement checks. Instead, the utility allowance will be applied to the amount of rent that individuals or families are required to pay; thereby increasing their HAP amount up to \$0 tenant rent. This will result in administrative cost savings.

This MTW activity serves the following statutory objectives:

Cost effectiveness

This MTW activity serves the following statutory objectives:

Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households

This is a new activity.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Pocatello MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

1.n. - Utility Reimbursements (HCV)

Due to the changes in utility allowance, we will no longer be issuing utility reimbursement checks. Instead, the utility allowance will be applied to the amount of rent that individuals or families are required to pay; thereby increasing their HAP amount up to \$0 tenant rent. This will save administrative cost.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
This is a new activity
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pocatello MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.

1.r. - Elimination of Deduction(s) (PH)
To simplify the process of income certification, HACP is eliminating deductions for non-elderly and non-disabled families. This includes but is not limited to: elimination of the allowance of \$480 for each minor dependent in a household and elimination of the childcare allowance for out-of-pocket expenses for the care of minors under the age of 13 to allow an adult household member to engage in work activities. To limit hardships caused by this activity, Tenant rent portions will now have a minimum of 27% of their income reduced from 30% via activity 1.g and 1.h.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Increased expenditures Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types
This is a new activity.
This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pocatello MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
The Impact Analysis that applies to this MTW activity also applies to the following MTW activities: 1.g. - Total Tenant Payment as a Percentage of Gross Income (PH) 1.h. - Total Tenant Payment as a Percentage of Gross Income (HCV) 1.r. - Elimination of Deduction(s) (PH) 1.s. - Elimination of Deduction(s) (HCV)
Following deduction(s) will be eliminated, modified, or added. Dependent allowance Unreimbursed childcare costs Other All deductions for non-elderly and non-disabled families are being eliminated.

1.s. - Elimination of Deduction(s) (HCV)
To simplify the process of income certification, HACP is eliminating deductions for non-elderly and non-disabled families. This includes but is not limited to: elimination of the allowance of \$480 for each minor dependent in a household and elimination of the childcare allowance for out-of-pocket expenses for care of minors under the age of 13 to allow an adult household member to engage in work activities. To minimize hardships caused by this activity, Tenant rent portions will now have a minimum of 27% of their income reduced from 30% via activity 1.g and 1.h.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Increased expenditures Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types
This MTW activity applies to the following housing choice voucher unit types: This applies to all units, regardless of voucher type
This is a new activity.
This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pocatello MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
Following deduction(s) will be eliminated, modified, or added. Dependent allowance Unreimbursed childcare costs All deductions for non-elderly and non-disabled families will be eliminated.

1.v. - Alternative Income Inclusions/Exclusions (PH)
Under existing HUD regulations, all but \$480 of earned income is excluded for full-time students. Using its MTW flexibility, HACP will adopt a policy of excluding all full-time student earned income for other household members aged 18-24. This income exclusion applies to full-time students other than the head of household, co-head, and spouse. Because this income is fully excluded, HACP will not require verification. However, HACP will verify the qualification for the exclusion. For other household members between the ages of 18-21 who are not full-time students, HACP will exclude income in the same fashion
This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency
This MTW activity serves the following statutory objectives: Neutral (no cost implications)
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
This is a new activity.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pocatello MTW agency Received 0 hardship requests Approved hardship requests

Denied hardship requests
There is\are hardship requests pending.

Following inclusions or exclusions will be eliminated, modified, or added.
Using its MTW flexibility, HACP will adopt a policy of excluding all full-time student earned income for other household members aged 18-24. This income exclusion applies to full-time students other than the head of household, co-head, and spouse. For other household members between the ages of 18-21 who are not full-time students, HACP will exclude income in the same fashion.

1.w. - Alternative Income Inclusions/Exclusions (HCV)

Under existing HUD regulations, all but \$480 of earned income is excluded for full-time students. Using its MTW flexibility, HACP will adopt a policy of excluding all full-time student earned income for other household members aged 18-24. This income exclusion applies to full-time students other than the head of household, co-head, and spouse. Because this income is fully excluded, HACP will not require verification. However, HACP will verify the qualification for the exclusion. For other household members between the ages of 18-21 who are not full-time students, HACP will exclude income in the same fashion.

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

This MTW activity serves the following statutory objectives:
Neutral (no cost implications)

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households

This is a new activity.

No hardship were requested in the most recent fiscal year.

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

Following inclusions or exclusions will be eliminated, modified, or added.
Using its MTW flexibility, HACP will adopt a policy of excluding all full-time student earned income for other household members aged 18-24. This income exclusion applies to full-time students other than the head of household, co-head, and spouse. For other household members between the ages of 18-21 who are not full-time students, HACP will exclude income in the same fashion.

2.b. - Payment Standards- Fair Market Rents (HCV)

HACP plans to increase the voucher payment standard to 120% for all voucher holders. We will start July 1, 2022, and it take effect at the first annual review. The current payment standards are not keeping up with the market. Raising the FMR will give more shopping power when coming on the program and it will give assisted families more financial relief.

This MTW activity serves the following statutory objectives:
Housing choice

This MTW activity serves the following statutory objectives:
Increased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households

This will implemented the first submission year.

This MTW activity requires a Safe Harbor Waiver.
The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

No hardship were requested in the most recent fiscal year.

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

Following will explain the payment standards by FMR: The payment standards will be increased from 110% of the published FMR's to 120% of the FMR's.

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

Federal regulations require an outside contractor to perform HQS inspections and rent reasonableness determinations on PHA-owned units receiving federal subsidies for housing programs. In order to reduce cost and achieve greater cost-effectiveness in federal expenditures, HACP will conduct inspections and determine rent reasonableness for HACP owned units using MTW waivers. Eliminating the independent entity will improve administrative efficiencies, eliminate confusion for the resident(s) of the unit, and improve the response time for performing inspections.

This activity will also allow HACP to perform the functions of rent reasonableness determinations, HQS inspections, and enter into agreements to the terms of the HAP contract without the need for an independent entity for HACP-owned units.

This will save money spent on third-party inspectors.

This MTW activity serves the following statutory objectives:

Cost effectiveness

This MTW activity serves the following statutory objectives:

Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households

This is a new activity

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Pocatello MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

Following will explain quality assurance method:

Every month, one unit due for annual inspection will be randomly chosen to receive a third-party inspection. and attached for quality assurance method

Following will explain rent reasonableness determination method:

See upload and attached for rent reasonableness determination method

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

Households in which all members are elderly and/or disabled and there is no earned income shall be recertified on a triennial basis. Recertifications for households in which all household members are 65 and older or disabled, even if household members have earned income, will be recertified only on a triennial basis. Households that fall into the category above, will be required to report changes in income and an interim recertification shall be conducted and tenant rent adjusted accordingly.

This MTW activity serves the following statutory objectives:

Cost effectiveness

Self-sufficiency

This MTW activity serves the following statutory objectives:

Decreased expenditures

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

This MTW activity applies to:

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

This is a new activity.

This MTW activity requires a Safe Harbor Waiver.

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pocatello MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
The Impact Analysis that applies to this MTW activity also applies to the following MTW activities: 3.a. - Alternative Reexamination Schedule for Households (PH) 3.b. - Alternative Reexamination Schedule for Households (HCV)
Recertification Schedule is Once every three years
Household may request 2 or more interim recertifications per year.
Households will be required to report changes in income or other family/household circumstances, an interim recertification shall be conducted and tenant rent adjusted accordingly. The ROSS coordinator will remind families of this requirement if they mention these changes during HACP community events or individual self-sufficiency meetings.

3.b. - Alternative Reexamination Schedule for Households (HCV)
Households in which all members are elderly and/or disabled and there is no earned income shall be recertified on a triennial basis. Recertifications for households in which all household members are 65 and older or disabled, even if household members have earned income, will be recertified only on a triennial basis. Households that fall into the category above, will be required to report changes in income and an interim recertification shall be conducted and tenant rent adjusted accordingly.
This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency
This MTW activity serves the following statutory objectives: Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types
This MTW activity applies to the following housing choice voucher unit types: This activity applies to all elderly and disabled families, regardless of voucher type.
This is a new activity
This MTW activity requires a Safe Harbor Waiver. The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).
This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pocatello MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
Recertification Schedule is Once every three years
Household may request 2 or more interim recertifications per year.
Households will be required to report changes in income or other family/household circumstances, an interim recertification shall be conducted and tenant rent adjusted accordingly.

4.a. - Vacancy Loss (HCV-Tenant-based Assistance)
To provide a safety net for landlords and encourage them to lease to our recipients, we are establishing a vacancy loss and damage mitigation fund. To qualify for the vacancy loss, landlords must have been leasing to an HCV recipient prior to the vacancy. HACP will provide up to one month of rent as a vacancy loss payment if the landlord leases to a HCV participant off of our waitlist. This payment will be issued at the time of the execution of the HAP contract.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity serves the following statutory objectives: Increased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
This is a new activity
This MTW activity requires a Safe Harbor Waiver. The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pocatello MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This policy applies to Certain types of units only
The types of units policy applies to: Other When a landlord agrees to rent to a new participant from the waitlist, HACP will offer no more than 1 months rent to cover vacancy loss.
Maximum payment to the landlord is \$1 month of rent according to previous HAP contract..
0 payments were issued under this policy y in the most recently completed PHA fiscal year.
\$0 issued under this policy in the most recently completed PHA fiscal year.

4.b. - Damage Claims (HCV-Tenant-based Assistance)
To provide a safety net for landlords and encourage them to lease to our recipients, we are establishing a vacancy loss and damage mitigation fund. Landlords who wish to apply for assistance from the damage mitigation fund must have experienced damages to a unit in excess of the amount of the security deposit. Adequate evidence of damages inflicted by the tenant must be provided in the form of pictures, receipts, invoices, etc. Landlords who are able to meet these requirements would be eligible for assistance up to the equivalent of one month of rent.
This will motivate landlords hesitant to lease to HCV families due to the belief that HCV tenants are more risky than tenants not receiving assistance.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity serves the following statutory objectives: Increased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
This is a new activity
This MTW activity requires a Safe Harbor Waiver. The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pocatello MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This policy applies to To all units
The types of units policy applies to:

Maximum payment to the landlord is \$1 months rent according to previous HAP contract..
0 payments were issued under this policy y in the most recently completed PHA fiscal year.
\$0 issued under this policy in the most recently completed PHA fiscal year.

4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)
Due to a tight housing and rental market, HACP has seen a decrease in the waitlist lease-up percentage from 57% to 28%. In order to encourage landlords and property owners to rent to our participants/recipients/residents, we will offer a lease-up incentive in the amount of \$300. In order to qualify for this incentive, the landlord and/or property owner must rent a new unit to an individual or family off the waiting list.
The amount of the incentive will be reduced by \$75 each time a re-inspection is required due to any life-threatening failures and/or ten or more non-life-threatening fails. If there are less than ten non-life-threatening fails, the landlord/owner is eligible to receive the lease-up incentive in the full amount. This will ensure the new units made available to HACP families will be of high-quality.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity serves the following statutory objectives: Increased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions (i.e., applicants) only
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies to all family types
The MTW activity applies to all tenant-based units
This is a new activity
This MTW activity requires a Safe Harbor Waiver. The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pocatello MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This policy applies to Certain types of units only (Display selected and additional Pop up is complex logic.)
The types of units policy applies to: Units/landlords new to the HCV program
Maximum payment to the landlord is \$\$300.
0 payments were issued under this policy y in the most recently completed PHA fiscal year.
\$0 issued under this policy in the most recently completed PHA fiscal year.

5.c. - Third-Party Requirement (HCV)
Federal regulations require an outside contractor to perform HQS inspections and rent reasonableness determinations on PHA-owned units receiving federal subsidies for housing programs. In order to reduce cost and achieve greater cost-effectiveness in federal expenditures, HACP will conduct inspections and determine rent reasonableness for HACP owned units using MTW waivers. Eliminating the independent entity will improve administrative efficiencies, eliminate confusion for the resident(s) of the unit, and improve the response time for performing inspections.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households

This is a new activity
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pocatello MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
The quality assurance method: Following will explain the quality assurance method – Every month, 1 unit due for annual inspection will be randomly chosen for inspection via a third-party inspector. If [Upload file] options- Display 'Attached for quality assurance method"

5.d. - Alternative Inspection Schedule (HCV)

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 arise. 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.
This MTW activity serves the following statutory objectives: Cost effectiveness Housing choice
This MTW activity serves the following statutory objectives: Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
This is a new activity
This MTW activity requires a Safe Harbor Waiver. The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pocatello MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.

9.b. - Increase PBV Project Cap (HCV)

N/A
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pocatello MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.

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

The competitive process for the placement of PBV is expensive coupled with a extended period of time to process. PVB's are valuable asset to community and serve the PHA best when they are used to create a partnership.

Removing the competitive process will allow the PHA to openly work to create partnerships that will serve the most vulnerable applicants. Removing the competitive process will allow open discussions about the future development of housing units.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Increased revenue
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions (i.e., applicants) only
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies to all family types
The MTW activity applies to all tenant-based units
We have not yet implemented.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pocatello MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.

9.d. - Alternative PBV Selection Process (HCV)
Allowing the PHA to alter the selection process will increase the opportunity to develop PBV's in the future.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity serves the following statutory objectives: Increased revenue
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions (i.e., applicants) only
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies to all family types
The MTW activity applies to all tenant-based units
Allowing for alternative selection will allow for more flexibility for the PBV program and for interested housing providers to partner with HACP.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pocatello MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.

11.b.PH - Policies for Addressing Increases in Family Income (PH)
The Skills and Development center will give the families clear pathways to self-sufficiency through employment and education.
This MTW activity serves the following statutory objectives: Self-sufficiency
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households

No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pocatello MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
Following is the policy for the increased earnings for families participating in the MTW Self-Sufficiency program: There will be financial incentives attached to goals for the families participating in the MTW self-sufficiency program. HACP will follow the guideline of the FSS program for creating escrow. Other incentives will helping with the cost of tuition. and or items that may be required for on the job training or permanent employment.

11.b.HCV - Policies for Addressing Increases in Family Income (HCV)

HACP would like to expand the office space to house a "skills and development"(SD) center. We have partnered with United way to create a pathway for HCV participants to gain access to services such as child care, financial literacy, and case management. HACP has partnered with Idaho State University to create a pathway to higher education. Remedial classes were be held at the SD center to help prepare HCV participants for college level classes, and there will be student mentor to help HCV participants navigate the process. HACP has partnered with 3 of the largest employers to create a pathway to employment. The SD center will teach soft skills based on the needs of the employers. There is a huge shortage of employees in Pocatello and there a over 1500 entry level positions. HACP has partnered with the Department of labor to increase employment opportunities, paid internships, and tuition to trade schools. The SD center is not duplicating any services already available in the community, it is a center for clients to take the first steps to self-sufficiency. The center itself will house HACP's VASH Coordinator (VA employee), A housing navigator(United Way Employee) and Service Coordinator (HACP employee). There will be a computer lab and training room. HACP has received over \$65,000 in funds from the City of Pocatello as incentives for the Skills and Development Center.
This MTW activity serves the following statutory objectives: Self-sufficiency
This MTW activity serves the following statutory objectives: Increased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
This would be our first year of implementation
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pocatello MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
Following is the policy for the increased earnings for families participating in the MTW Self-Sufficiency program:

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

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

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2021	\$91,440	\$0	\$91,440	2023-02-22
2022	\$107,355	\$0	\$107,355	2024-02-22

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	10
	49%-30% Area Median Income	34
	Below 30% Area Median Income	64
	Total Local, Non-Traditional Households	108

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

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

G.3	Substantially the Same (STS) – Local, Non-Traditional.
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	6,816 # 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.	864 # 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	110
2 Person	247
3 Person	172
4 Person	43
5 Person	8
6+ Person	2
Totals	582

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.



Minimum Rent Impact Analysis

prepared by:
Brianna Pollard
MTW Policy Intern

Introduction:

HACP currently has HAP recipients who do not pay anything towards their housing costs. Under HACP's new move to work designation, we are seeking a waiver to require all non-elderly, non-disabled recipients to pay something towards their housing costs. We hope to have a minimum rent policy using the following calculation: $((\text{Minimum wage} \times 15 \text{ hours} \times 52 \text{ weeks}) / 12 \text{ months}) \times 27\%$. The minimum wage is currently \$7.25 in the area that HACP serves, however this policy allows for automatic adjustment based upon federal, state, or local adjustments to minimum wage. For 2021-2022, this results in a minimum rent amount of \$127.24. In this analysis, we will examine how many of the HAP recipients will be impacted by this as well as to what degree.

Analysis:

Data being utilized is from a report pulled on Jul 11, 2021 for this analysis. This policy will only be applied to non elderly/non disabled households so they are the only households that are being examined in this analysis. Most of HACP's HAP recipients will not be impacted by the minimum rent requirement of \$127.24. 19.6% of all households will be impacted by some amount each month, and 18.4% of all households will be impacted by \$25 or more.

Table 1. Impacted Populations by Demographic

	Impacted	Impacted by \$25 or more monthly
Men (only household member)	4 (3.7%)	4 (3.9%)
Men (1 dependent)	2 (1.8%)	2 (1.9%)
Men (2 or more dependents)	5 (4.6%)	5 (4.9%)
Women (only household member)	15 (13.8%)	15 (14.9%)
Women (1 dependent)	25 (22.9%)	21 (20.8%)
Women (2 or more dependents)	58 (53.2%)	54 (53.5%)
Men	11 (10.1%)	11 (10.9%)
Women	98 (89.9%)	90 (89.1%)

2 or more dependents	42 (38.5%)	59 (58.4%)
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Impact

The majority of HAP recipients are women, and this trend continues to those who are paying less than the threshold of minimum rent. It will also be especially impactful for HACP’s participants with two or more dependents.

Cost Implications

For those that will be impacted by the policy, there is a total of \$6,432 being paid in tenant rent each month. With the implementation of minimum rent, this number would be at as much as \$20,740.12. We expect that there will be participants who need to access a hardship exemption and/or elect to participate in MTW training and have the minimum rent requirement waived for the first year. If we are able to achieve 60% of these participants paying minimum rent, it would result in a monthly savings of an estimated \$6,012.07 for an annual total of \$72,144.86.

Discussion:

Because we know that the recipients who will be most impacted by the new minimum rent policy are households with dependents, MTW related training and courses will have specific resources for parents and children in HACP’s Skill Center. Additionally, all impacted recipients will be able to access hardship exemptions as needed, and during their first year participating in the self-sufficiency program by attending courses and working with the network navigator, they will be able to have the minimum rent waived allowing them the opportunity to increase their income.



Utility Allowance Impact Analysis
Draft 2

prepared by:
Brianna Pollard
MTW Policy Intern

Introduction:

HACP uses forms provided by HUD to calculate our recipients' utility allowances based upon which energy types, housing type, and bedroom size their residence has as well as what the landlord includes in the rent. This calculation can be time consuming and confusing for both recipients and staff members. Additionally, some residents receive a utility reimbursement payment for the amount of their utility allowance that was not actually needed for utilities. Under a new Move to Work activity, we intend to standardize the utility payment per bedroom size by finding the average amount of the utility allowance, excluding 0s.

Analysis:

Data being utilized is from a report pulled on Jul 11, 2021 for this section of the analysis. 555 households were analyzed. Most households will experience an increase in their utility allowance or a similar allowance under this activity. 159 households will experience a decrease in their utility allowance which is roughly 29% of households. Roughly 11% of households will experience a decrease of \$25 or more.

Table 1. Utility Allowance

	0/Studio	1 Bed	2 Bed	3 Bed	4 Bed	5 Bed
Proposed Allowance	\$47	\$56	\$79	\$113	\$140	\$236
Decrease in UA	1/8 (13%)	31/100 (31%)	61/197 (31%)	50/145 (34%)	13/34 (38%)	3/9 (33%)
Decrease by \$25 or more	1/8 (13%)	5/100 (5%)	27/197 (14%)	15/145 (10.3%)	11/34 (32%)	3/9 (33%)
Cost Implications						
Total Proposed for Bedroom Size	\$376	\$5,600	\$15,642	\$16,498	\$4,760	\$2,124
Total Current for Bedroom Size	\$279	\$4,475	\$13,692	\$14,666	\$4,618	\$2,128

Impact

This activity tends to have a greater impact on families in larger bedroom sizes with more dependents.

Cost Implications

The total current monthly cost for utilities is \$39,858. The proposed monthly cost is \$45,000. The difference between these two is \$5,142 monthly and \$61,704 annually. However, we do expect an administrative savings of \$98,250. This results in an annual cost savings of \$36,546.

Discussion:

The cost savings achieved from this activity will create more capacity with HACP's staff. We anticipate using this capacity will allow voucher staff to engage in additional landlord and community outreach activities that will help more households get off of the waitlist and into housing in a timely manner.

The following will analyze the impact of a triennial recertification schedule for households where all members are elderly or disabled, and there is no earned income.

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)

This will not affect per family contribution, however, this activity should save about two hours of staff time per household annually. Instead of doing between 344 certifications a year. Staff will instead do between 115-150 full certifications a year in addition to streamlined annual rent adjustments for these qualifying households. HACP estimates that this will result in administrative cost savings between \$24,000 - \$25,500

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)

This activity will only affect how much families will pay towards their housing costs if there is a change in the families fixed income amount, or type of income the family receives.

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)

This activity will enable staff to process more initial certifications, while this doesn't directly affect the waitlist, it can mean that HACP will be able to process higher counts per waitlist pull.

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)

Because these families often forget or are unable to complete recertifications independently, and often do not complete them on time, this activity may decrease the agency's termination of vulnerable families. While our ROSS coordinator does what they can to prevent this, only requiring these families to recertify every 3 years will ensure fewer vulnerable families slip between the cracks,

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

This activity will not impact public housing occupancy level or utilization in the HCV program.

6. Describe the impact on meeting the MTW statutory goals of cost effectiveness, self sufficiency, and/or housing choice.

This activity will meet the MTW statutory goals of cost effectiveness and self sufficiency. Performing fewer recertification on families whose income rarely changes will allow staff to work on other tasks, which will ultimately save the agency money spent on personnel costs. For many elderly and disabled families, self sufficiency is maintaining safe, sanitary, and reliable housing in their community. Not having to perform recertifications annually will reduce the possibility of them missing recertification deadlines and being at jeopardy of losing their housing

assistance. Fewer families needing assistance with their recertification paperwork will also free up time for our ROSS coordinator to help residents with other self-sufficiency goals.

7. Describe the impact on the rate of hardship requests and the number granted and denied as a result of this activity

HACP expects hardships for this activity to be very few in number. Families can request interim recertifications for changes in income, or may request an annual recertification schedule as a reasonable accommodation. Feedback from current residents indicated this activity will only improve or residents satisfaction with our services.

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

This activity is intended to benefit the protected classes of elderly and disabled. Currently, HACP provides services to 344 elderly or disabled families.



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

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.

Minimum Rents

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 repayment 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 tenant rent portion, after applying the new minimum rent, is greater than 27% of the household's income taking into consideration the utility allowance that they receive.
- 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 minimum rents.

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 repayment 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 utility allowances.

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.



Housing Alliance
and
HACP Community Partnerships

As part of the community engagement for the review of PHA activities for the Move to Work Plan was made available for public review February 25, 2022, through April 11, 2022. A Copy of plan were available to review at the following offices:

The City of Pocatello, City Hall
911 North 7th Ave Pocatello Id

Marshall Library
113 Garfield Ave Pocatello

HACP Main office
711 North 6 Ave Pocatello

A public notice was published in the Idaho Journal on February 27, 2022, and again on March 6, 2022, requesting written comments on the plan and or to attend a public meeting on March 21, 2022, at the HACP head office.

HACP presented the MTW plan to the Homeless and Housing Coalition on January 18, 2022, and at the Department of Social and Health Welfare on March 16, 2022.

HACP did not receive any verbal comments or written comments through the venues mentioned above.

HACP met with RAB, the City of Pocatello, CDBG, Idaho State University, and other local agencies. Pocatello has employment issue. Prior to the pandemic there was less than 3% unemployment rate. That number is slightly higher now, but there are over a hundred vacant of positions available, between all the large employers. We as a community need to collaborate with these companies to create a pathway to employment. The skills and development center will give HACP assisted families additional support to access employment.

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 graduating from high school and who have not planned or do not have the resources to attend college or trade 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.

Sarah Van Cleve
Executive Director
H.A.C.P.



PROOF OF PUBLICATION
Idaho State Journal

State of Idaho
County of Bannock

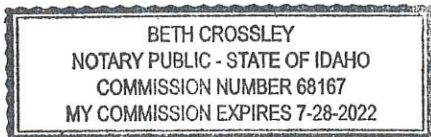
I, Dawn Giannini, or Collins Crapo first being duly sworn, depose and say: That I am the Classified Manager or Processing Clerk employed by Adams Publishing Group of the Rockies LLC, publishers of Idaho State Journal, a newspaper of general circulation, published 4 days, Tues-Wed-Friday and Sunday, at Pocatello, Idaho.

That the notice, of which a copy is hereto attached and made a part of this affidavit, was published in said Idaho State Journal for 2, first publication having been made on 02/27/2022 last publication having been made on 03/06/2022, and that the said notice was published in the regular and entire issue of said paper on the respective dates of publication, and that such notice was published in the newspaper and not in a supplement.

[Handwritten signature]

Subscribed and sworn to before me, on this 8th day of March, 2022

[Handwritten signature: Beth Crossley]



Notary Public
My commission expires:

attached jurat

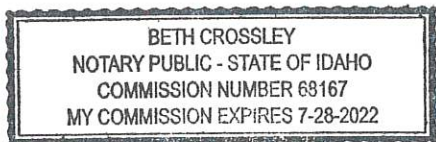
STATE OF IDAHO

ss.

COUNTY OF BANNOCK

On this 8th day of March, 2022 before me, the undersigned, a Notary public for said state, personally appeared Dawn Giannini or Collins Crapo, known or identified to me to be the person(s) whose name(s) is/are subscribed to the within instrument, and being by me first duly sworn, declared that the statements therein are true, and acknowledged to me that he/she/they executed the same,

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal the day and year in this certificate first above written.



[Handwritten signature: Beth Crossley]

Notary Public for APG of the Rockies
Residing: Idaho Falls, Idaho
Commission expires:

HOUSING ALLIANCE AND COMMUNITY PARTNERSHIPS NOTICE OF PUBLIC COMMENT OPPORTUNITY

Place: Housing Alliance and Community Partnerships Administrative Offices, 711 N. 6th Ave, Pocatello; City Hall, 911 N. 7th Avenue, Pocatello; or Public Library, 113 South Garfield Avenue, Pocatello.

Notice is hereby given that the Housing Alliance and Community Partnerships will receive comments from the public concerning its proposed Annual HUD Strategic Plan and Capital Fund. This plan is available for public inspection and written comment Feb 25th, 2022 through March April 11th, 2022 at the above specified locations.

Comments may be made in writing to Sarah Van Cleve, Executive Director, Housing Alliance and Community Partnerships, 711 N. 6th Avenue, Pocatello, Idaho 83201. All interested parties are invited to offer oral comment at the public hearing scheduled for Wednesday, March 21st, 2022 from 10:30 to 11:00 a.m. at Housing Alliance and Community Partnerships.

No oral comments will be taken until that time.

Published Feb 27 and Mar 6, 2022 (ISJ1494-207834)

RESOLUTION NO. 22-02

Whereas, Housing Alliance and Community Partnerships the due date for the FY23 Annual Plan, the MTW Supplemental Plan and the Capital Funds due date is April 17, 2022.

Whereas, Housing Alliance and Community Partnership the plan(s) were approved by the City of Pocatello.

Whereas, Housing Alliance and Community Partnership the plan(s) were reviewed by the Resident Advisory Board of Christensen Court.

Whereas, Housing Alliance and Community Partnership agrees developed a MTW plan to allow for flexibility of Housing Choice Voucher funds (HAP) and Capital Funds Program (CFP) to fulfill the waivers requested in the plan

Whereas, Housing Alliance and Community Partnership certify that all the public review and public comments period were held February 25, 2022 through April 6, 2022.

Now therefore, be it resolved by the Board of Commissioners of the Housing Authority of the City of Pocatello approve Resolution 20-02 for the submission of the FY23 Annual Plan, The MTW Supplemental Plan, and the Capital Funds Plan

After discussion, Commissioner/Director Sharlyn Reddish made a motion that the Resolution be adopted in the form presented, Commissioner/Director Lori Craney seconded the motion and on roll call, the following vote was recorded:

AYES 5

NAYS 0

Janice Macent Chair/Vice Chair

CERTIFICATE OF A RECORDING OFFICER

The undersigned, being the recorder and custodian of the minutes of the governing body of HACP, on whose behalf the foregoing instrument was executed, hereby certifies that on the 25th, day of July, 2017, at a validly convened meeting of The Housing Authority of the City of Pocatello at which a quorum was present and voting, the above entitled Resolution was introduced and read and approved.

In witness whereof my hand and seal of the Housing Authority of the City of Pocatello, this 11 day of April .

Housing Authority of the City of Pocatello

Sarah VanCleave
Executive Director / Secretary 4.11.22

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (07/01/2022), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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