

# PHA Name : Portsmouth RHA

**PHA Code :** VA001

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

**PHA Program Type:** Combined

**MTW Cohort Number:** Stepped and Tiered Rent

**MTW Supplement Submission Type:** Annual Submission

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

The Portsmouth Redevelopment and Housing Authority has identified three primary goals to drive its MTW activities and further the federal MTW statutory goals. These goals will be our focus in the 2024 Plan year.

Goal 1 - Operational Efficiency through Innovation - Streamline business processes and implement advanced technological solutions that will result in operational cost efficiencies and enable the reallocation of resources to local initiatives and strategies.

Cost Effective Activities to be Implemented in Year 2

1. Rent Reform
2. Alternate Inspection Requirements
3. Alternate Verification Hierarchy
4. Simplified Utility Allowances

Goal 2 - Self-Sufficiency - Provide alternate incentives designed to motivate families to actively seek financial independence and transition from dependency on housing subsidies. Carefully measure the success of each incentive to identify and replicate the greatest motivators.

Self-Sufficiency Activities to be implemented in Year 2

1. Rent Reform
2. Family Independence Initiative

Goal 3 - Expand Housing Opportunities – Complete the conversion of all remaining Public Housing; redevelop existing public housing sites and develop new housing in areas of opportunity throughout the City of Portsmouth.

Expanding Housing Opportunities to be implemented in Year 2

1. Local Project-Based Voucher Program
2. Local Payment Standards
3. Landlord Incentive Program
4. Local Homeownership Program
5. Housing Development

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

<b>1. Tenant Rent Policies</b>	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Currently Implementing
d. Stepped Rent (HCV)	Currently Implementing
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	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)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
<b>2. Payment Standards and Rent Reasonableness</b>	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Plan to Implement in the Submission Year
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
<b>3. Reexaminations</b>	
a. Alternative Reexamination Schedule for Households (PH)	Currently Implementing
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
c. Self-Certification of Assets (PH)	Currently Implementing
d. Self-Certification of Assets (HCV)	Currently Implementing
<b>4. Landlord Leasing Incentives</b>	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Not Currently Implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Currently Implementing
<b>5. Housing Quality Standards (HQS)</b>	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Currently Implementing
d. Alternative Inspection Schedule (HCV)	Currently Implementing
<b>6. Short-Term Assistance</b>	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
<b>7. Term-Limited Assistance</b>	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	

Increase Elderly Age (PH & HCV)	Not Currently Implemented
<b>9. Project-Based Voucher Program Flexibilities</b>	
a. Increase PBV Program Cap (HCV)	Currently Implementing
b. Increase PBV Project Cap (HCV)	Currently Implementing
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Currently Implementing
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Currently Implementing
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
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)	Plan to Implement in the Submission Year
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Plan to Implement in the Submission Year
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
<b>11. MTW Self-Sufficiency Program</b>	
a.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>12. Work Requirement</b>	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
<b>14. Moving on Policy</b>	
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
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
<b>17. Local, Non-Traditional Activities</b>	
a. Rental Subsidy Programs	Was Discontinued in a previous Submission Year
b. Service Provision	Not Currently Implemented

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

<b>1.c. - Stepped Rent (PH)</b>
<p><b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b></p> <p>As part of the cohort-specific Rent Reform Study, PRHA will implement stepped rents for eligible Public Housing households as outlined by HUD in the Stepped Rent Policies. The stepped rent MTW activity will determine total tenant payment based on a fixed schedule versus household income. The intent of the stepped rent activity is to enable households to retain any increase in income, thus, providing incentives and improved opportunities for self-sufficiency</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness; Self-sufficiency</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Increased expenditures; Decreased expenditures</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p><b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b></p> <p>New admissions and currently assisted households</p>
<p><b>Does the MTW activity apply to all family types or only to selected family types?</b></p> <p>The MTW activity applies only to selected family types</p>
<p><b>Please select the family types subject to this MTW activity.</b></p> <p>Non-elderly, non-disabled families</p>
<p><b>Does the MTW activity apply to all public housing developments?</b></p> <p>The MTW activity applies to specific developments</p>
<p><b>Which developments participate in the MTW activity?</b></p> <p>Westbury Pine and Westbury Holly Square.</p>
<p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>The first year of implementation consisted of many staff training on policies and the software. PRHA has had challenges with the software. We hope that Year 2 will bring us definitive changes that are quantifiable.</p>
<p><b>Does this MTW activity require a hardship policy?</b></p> <p>Yes</p> <p>This document is attached.</p>

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

Yes

**Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)**

1.c. - Stepped Rent (PH); 1.d. - Stepped Rent (HCV); 2.a. - Payment Standards- Small Area Fair Market Rents (HCV); 3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)

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

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

No hardship were requested in the most recent fiscal year.

**Describe how the stepped rent is structured, including the following: how each household's rent will be set in the first year; how frequently rents will change and by what amount; and how the stepped rent will end (i.e., what is the maximum rent).**

As part of the cohort-specific Rent Reform Study, PRHA will implement stepped rents for eligible Public Housing households as outlined by HUD in the Stepped Rent Policies. The stepped rent MTW activity will determine total tenant payment based on a fixed schedule versus household income. The intent of the stepped rent activity is to enable households to retain any increase in income, thus, providing incentives and improved opportunities for self-sufficiency

**Please upload a document that presents the stepped rent schedule in the form of a table.**

This document is attached.

**If a household progresses all the way through the stepped rent schedule, what will their status be?**

They will no longer receive a subsidy

#### **1.d. - Stepped Rent (HCV)**

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

As part of the cohort-specific Rent Reform study, PRHA will implement the Stepped Rent Activity for qualified Housing Choice Voucher participants as specified in the HUD Stepped Rent study. The Stepped Rent activity will increase the household's TTP based on a fixed schedule and not household income. The Stepped Rent activity is intended to allow households to retain increased income providing incentives and opportunities to increase self-sufficiency.

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

Cost effectiveness; Self-sufficiency

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

Increased expenditures; Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

**Please select the family types subject to this MTW activity.**

Non-elderly, non-disabled families

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

The MTW activity applies to all properties with project-based vouchers

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

Year 1 of implementation focused on staff training and updating software. There was a delay with our software provider in Year 1. More quantifiable accomplishments are anticipated this current year.

**Does this MTW activity require a hardship policy?**

Provided Already

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

Yes

**What is the status of the Safe Harbor Waiver request?**

The waiver was previously approved.

**Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.**

PRHA i Safe Harbor waiver to enable participation in the Rent Reform demonstration study. This waiver will apply to households who are not otherwise exempt or excluded and who are randomly selected to pay rent under the Stepped Rent policies.

The study requires PRHA along with the other demonstration agencies to conduct a recertification for continued eligibility purposes only on a triennial basis. Rather than providing an interim recertification one each year as required under the Safe Harbor provisions, the Stepped Rent policies will provide for the family to request a hardship under PRHA's Hardship Policy if they experience a decrease in income that will create a rent burden in excess of 40% of the household's current monthly gross income.

**Does the MTW activity require an impact analysis?**

Yes

This document is attached.

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

Yes

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

1.c. - Stepped Rent (PH); 1.d. - Stepped Rent (HCV); 2.a. - Payment Standards- Small Area Fair Market Rents (HCV); 3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)

**Describe how the stepped rent is structured, including the following: how each household's rent will be set in the first year; how frequently rents will change and by what amount; and how the stepped rent will end (i.e., what is the maximum rent).**

As part of the cohort-specific Rent Reform study, PRHA will implement the Stepped Rent Activity for qualified Housing Choice Voucher participants as specified in the HUD Stepped Rent study. The Stepped Rent activity will increase the household's TTP based on a fixed schedule and not household income. The Stepped Rent activity is intended to allow households to retain increased income providing incentives and opportunities to increase self-sufficiency

**Please upload a document that presents the stepped rent schedule in the form of a table.**

This document is attached.

**If a household progresses all the way through the stepped rent schedule, what will their status be?**

They will no longer receive a subsidy

#### 1.i. - Alternative Utility Allowance (PH)

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

The Portsmouth Redevelopment and Housing Authority will utilize a single utility allowance schedule for tenant-paid utilities for all structure types in both the Public Housing and Housing Choice Voucher Programs. The utility allowance will be based on the bedroom size of the unit in the Public Housing Program and the size of the Voucher in the HCV Program.

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

Cost effectiveness

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

The MTW activity applies to all assisted households

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

Year 1 of Implementation focused on staff training and updating software. There was a delay with our software provider.

PRHA intends to fully implement changes in the current year.

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

No

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

The Portsmouth Redevelopment and Housing Authority will utilize a single utility allowance schedule for tenant-paid utilities for all structure types in both the Public Housing and Housing Choice Voucher Programs. The utility allowance will be based on the bedroom size of the unit in the Public Housing Program and the size of the Voucher in the HCV Program.

The utility allowance schedule will be calculated using the average consumption and costs for all utility types. PRHA will utilize a third-party vendor to review the utility allowance schedule each year. If the average consumption and/or costs have increased or decreased by more than 10% from the previous year, the schedule of allowances will be updated to

### 1.j. - Alternative Utility Allowance (HCV)

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

The Portsmouth Redevelopment and Housing Authority will utilize a single utility allowance schedule for tenant-paid utilities for all structure types in both the Public Housing and Housing Choice Voucher Programs. The utility allowance will be based on the bedroom size of the unit in the Public Housing Program and the size of the Voucher in the HCV

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

Cost effectiveness

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

The MTW activity applies to all assisted households

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

Year 1 of Implementation focused on staff training and updating software. There was a delay with our software provider. PRHA intends to fully implement changes in the current year.

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

No

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

The utility allowance schedule will be calculated using the average consumption and costs for all utility types. PRHA will utilize a third-party vendor to review the utility allowance schedule each year. If the average consumption and/or costs have increased or decreased by more than 10% from the previous year, the schedule of allowances will be updated to reflect current consumption and costs.

### 2.a. - Payment Standards- Small Area Fair Market Rents (HCV)

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

The Portsmouth Redevelopment and Housing Authority will adopt local MTW Payment Standards that are not less than 80% nor more than 150% of the HUD Small Area Fair Market Rent for the applicable zip codes.

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

Cost effectiveness; Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households
<p><b>Does this MTW activity require a hardship policy?</b></p> <p>Yes</p> <p>This document is attached.</p>
<p><b>Does the hardship policy apply to more than this MTW activity?</b></p> <p>Yes</p>
<p><b>Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</b></p> <p>1.c. - Stepped Rent (PH); 1.d. - Stepped Rent (HCV); 2.a. - Payment Standards- Small Area Fair Market Rents (HCV); 3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)</p>
<p><b>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</b></p> <p>No</p>
<p><b>How many hardship requests have been received associated with this activity in the past year?</b></p> <p>No hardship were requested in the most recent fiscal year.</p>
<p><b>Please explain the payment standards by ZIP code or "grouped" ZIP codes:</b></p> <p>The Portsmouth Redevelopment and Housing Authority will identify Primary Real Estate Submarkets (PRESM's) within the City. PRHA will utilize a third-party firm to conduct a market study to identify the rental submarkets and to complete a rent survey that will identify the actual market rents within each submarket. A separate payment standard schedule will be adopted for each PRESM based on the 75th percentile of the market rents for that submarket provided that the payment standard is not less than 80% nor more than 150% of the HUD Small Area Fair Market Rent for the applicable zip codes within the PRESM</p>

<b>2.d. - Rent Reasonableness – Third-Party Requirement (HCV)</b>
<p><b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b></p> <p>The Portsmouth Redevelopment and Housing Authority will utilize the MTW flexibility to perform rent reasonableness determination on Project-Based and Tenant-Based Voucher units that are owned, controlled, or managed by PRHA or a related affiliate.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness; Housing choice</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>Year 1 of Implementation focused on staff training and updating software. There was a delay with our software provider. PRHA intends to fully implement changes in the current year which will lead to more quantifiable accomplishments.</p>

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

No

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

This document is attached.

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

PRHA will utilize the third-party market studies submitted to lenders and investors for new projects to be developed under the PBV program. Rent for existing PBV properties and for owner-requested rent increases, will be based on the market rate rent in the property, if applicable, with no further comparison required. For properties with no market rate units, PRHA will secure a property specific rent comparability study.

In the Tenant-Based Voucher Program, PRHA will ensure that the rent charged for PRHA-controlled units is never higher than the applicable amount under the MTW Alternate Payment Standards. PRHA will review the average rent for similar properties within its voucher program when determining the reasonableness of the rent charged for PRHA-controlled units.

and attached for the rent reasonableness determination method

This document is attached.

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

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

In accordance with the Stepped Rent Activity, PRHA will conduct triennial recertification for all households that are randomly selected for the Study Group.

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

Cost effectiveness; Self-sufficiency

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

Year 1 of Implementation focused on staff training and updating software. There was a delay with our software provider.

PRHA intends to fully implement changes in the current year which will lead to more quantifiable accomplishments.

**Does this MTW activity require a hardship policy?**

Yes

This document is attached.

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

Yes

**Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)**

1.c. - Stepped Rent (PH); 1.d. - Stepped Rent (HCV); 2.a. - Payment Standards- Small Area Fair Market Rents (HCV); 3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)

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

No

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

No hardship were requested in the most recent fiscal year.

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

Yes

**What is the status of the Safe Harbor Waiver request?**

The waiver was previously approved.

**Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.**

The Portsmouth Redevelopment and Housing Authority is requesting a Safe Harbor Waiver for Activities 3a and 3b,

Alternate Reexamination Schedule for Public Housing and Housing Choice Voucher Program.

The standard MTW waiver provides that when an alternate recertification schedule is established, one interim

recertification per year is required if household gross income decreases by 10% or more.

PHA is requesting a waiver from the requirement of one interim recertification per year

**Does the MTW activity require an impact analysis?**

Yes

This document is attached.

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

Yes

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

1.c. - Stepped Rent (PH); 1.d. - Stepped Rent (HCV); 2.a. - Payment Standards- Small Area Fair Market Rents (HCV); 3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)

**What is the recertification schedule?**

Once every three years

**How many interim recertifications per year may a household request?**

0

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

Rather than providing an interim recertification, pursuant to the Stepped Rent policies, the family may request a hardship under PRHA's Hardship Policy if they experience a decrease in income that will create a rent burden in excess of 40% of the household's current monthly adjusted income.

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

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

Under the Stepped Rent Activity, PRHA will conduct triennial recertifications for households randomly selected for the Stepped Rent study.

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

Cost effectiveness; Self-sufficiency

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

Year 1 of Implementation focused on staff training and updating software. There was a delay with our software provider. PRHA intends to fully implement changes in the current year which will lead to more quantifiable accomplishments.

**Does this MTW activity require a hardship policy?**

Provided Already

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

Yes

**What is the status of the Safe Harbor Waiver request?**

The waiver was previously approved.

**Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.**

The Portsmouth Redevelopment and Housing Authority is requesting a Safe Harbor Waiver for Activities 3a and 3b, Alternate Reexamination Schedule for Public Housing and Housing Choice Voucher Program.

The standard MTW waiver provides that when an alternate recertification schedule is established, one interim

recertification per year is required if household gross income decrease by 10% or more.

PHA is requesting a waiver from the requirement of one interim recertification per year

**Does the MTW activity require an impact analysis?**

Provided Already

**What is the recertification schedule?**

Once every three years

**How many interim recertifications per year may a household request?**

0

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

Rather than providing an interim recertification, pursuant to the Stepped Rent policies, the family may request a hardship under PRHA's Hardship Policy if they experience a decrease in income that will create a rent burden in excess of 40% of the household's current monthly adjusted income.

**3.c. - Self-Certification of Assets (PH)**

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

The Portsmouth Redevelopment and Housing Authority will implement a self-certification process for all households in the Public Housing and Housing Choice Voucher Programs when the total household assets are less than \$50,000 (fifty thousand dollars).

PRHA will provide applicants and participating households with a standardized certification form to be completed at the time of admission or recertification

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

Cost effectiveness

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

Year 1 of Implementation focused on staff training and updating software. There was a delay with our software provider.

PRHA intends to fully implement changes in the current year which will lead to more quantifiable accomplishments.

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

No

**Please state the dollar threshold for the self-certification of assets.**

\$50,000.

**3.d. - Self-Certification of Assets (HCV)**

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

The Portsmouth Redevelopment and Housing Authority will implement a self-certification process for all households in the Public Housing and Housing Choice Voucher Programs when the total household assets are less than \$50,000 (fifty thousand dollars).

PRHA will provide applicants and participating households with a standardized certification form to be completed at the time of admission or recertification

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

Year 1 of Implementation focused on staff training and updating software. There was a delay with our software provider.

PRHA intends to fully implement changes in the current year which will lead to more quantifiable accomplishments.

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

No

**Please state the dollar threshold for the self-certification of assets.**

\$50,000.

**4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)**

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

The Portsmouth Redevelopment and Housing Authority will provide an incentive payment to new landlords who have not previously participated in the Housing Choice Voucher Program.

The incentive payment will be equal to one month's contract rent and will be paid upon execution of a Housing Assistance Payments Contract.

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

Housing choice

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

The MTW activity applies to all assisted households

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

Year 1 of Implementation focused on staff training and updating software. There was a delay with our software provider.

PRHA intends to fully implement changes in the current year which will lead to more quantifiable accomplishments.

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

No

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

Certain types of units only

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

One Month Contract Rent

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

10

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

\$1,000

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

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

The Portsmouth Redevelopment and Housing Authority will utilize the MTW flexibility to perform Housing Quality Standards (HQS) inspections on Project-Based and Tenant-Based Voucher units that are owned, controlled, or managed by PRHA or a related affiliate.

For quality assurance purposes, a staff supervisor will conduct quality control inspections for 20% of all inspections completed by staff for PRHA-controlled units with project-based or Tenant-Based vouchers.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

Year 1 of Implementation focused on staff training and updating software. There was a delay with our software provider.

PRHA intends to fully implement changes in the current year which will lead to more quantifiable accomplishments.

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

No

**Please explain or upload the description of the quality assurance method:**

Following will explain the quality assurance method  
For quality assurance purposes, a staff supervisor will conduct quality control inspections for 20% of all inspections completed by staff for PRHA-controlled units with Project Based or Tenant-Based vouchers

No document is attached.

**5.d. - Alternative Inspection Schedule (HCV)**

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

The Portsmouth Redevelopment and Housing Authority will utilize an alternate inspection schedule. All Housing Choice Voucher units will be inspected on a triennial basis. Interim inspections will be conducted upon request of a program participant or a report from a third-party entity such as the code enforcement department or social service agency indicating concerns with the condition of the unit.

In order to achieve the highest level of operational efficiency, PRHA will stagger the implementation of this activity over three years to ensure that the numbers of inspections are scheduled evenly over the execution period.

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

Cost effectiveness

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

The MTW activity applies to all assisted households

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

Year 1 of Implementation focused on staff training and updating software. There was a delay with our software provider.

PRHA intends to fully implement changes in the current year which will lead to more quantifiable accomplishments.

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

No

**9.a. - Increase PBV Program Cap (HCV)**

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

The Portsmouth Redevelopment and Housing Authority will develop and implement a local MTW Project Based Program that will include the activities listed below.

Increase in Project Cap - PRHA will increase the Project Based Voucher Program project cap to up to 100% of units in a project regardless of project type. Projects serving families will not be required to provide supportive services to project-based up to 100% of the units.

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

Cost effectiveness; Housing choice

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

Year 1 of Implementation focused on staff training and updating software. There was a delay with our software provider.

PRHA intends to fully implement changes in the current year which will lead to more quantifiable accomplishments.

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

No

**What percentage of total authorized HCV units will be authorized for project-basing?**

50.00%

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

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

The Portsmouth Redevelopment and Housing Authority will develop and implement a local MTW Project Based Program that will include the activities listed below.

Increase in Project Cap - PRHA will increase the Project Based Voucher Program project cap to up to 100% of units in a project regardless of project type. Projects serving families will not be required to provide supportive services to

project-based up to 100% of the units.

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

Cost effectiveness; Housing choice

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

Year 1 of Implementation focused on staff training and updating software. There was a delay with our software provider.

PRHA intends to fully implement changes in the current year which will lead to more quantifiable accomplishments.

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

No

#### **9.c. - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or**

Replacement (HCV)
<p><b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b></p> <p>The Portsmouth Redevelopment and Housing Authority will develop and implement a local MTW Project Based Program that will include the activities listed below.  Elimination of Selection Process - PRHA will eliminate the selection process in the award of Project Based Vouchers to a property owned by a sole asset entity that is an affiliate of and controlled by PRHA. Such projects shall be subject to site selection requirements; subsidy layering approval; and HQS inspections performed by an independent entity.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness; Housing choice</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Decreased expenditures</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>Year 1 of Implementation focused on staff training and updating software. There was a delay with our software provider.  PRHA intends to fully implement changes in the current year which will lead to more quantifiable accomplishments.</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>

9.h. - Limit Portability for PBV Units (HCV)
<p><b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b></p> <p>The Portsmouth Redevelopment and Housing Authority will develop and implement a local MTW Project Based Program that will include the activities listed below.  Portability Limit - PRHA will provide a Choice Mobility voucher to a participant who has resided in a Project Based Voucher for a minimum of 24 months. A PBV participant may request a Choice Mobility voucher on the second anniversary of their PBV lease agreement. The property management agent for the PBV property must certify that the tenant complies with all terms and conditions of their lease agreement and their PBV family obligations. Upon approval from the management agent, the request will be placed on the Choice Mobility waiting list. Choice Mobility applicants will be offered tenant-based vouchers as available based on the date of request. If not approved, participants shall be entitled to a review of the denial pursuant to the review process outlined in the Administrative Plan.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness; Housing choice</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Decreased revenue</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p>

The MTW activity applies to all assisted households

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

Year 1 of Implementation focused on staff training and updating software. There was a delay with our software provider.

PRHA intends to fully implement changes in the current year which will lead to more quantifiable accomplishments.

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

No

**10.d.PH - Modify or Eliminate the Contract of Participation (PH)**

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

The Portsmouth Redevelopment and Housing Authority will eliminate the Family Self-Sufficiency (FSS) Program Contract of Participation and replace the traditional FSS escrow calculation with a flat payment system to address increases in family income.

The Family Independence Initiative (FII) will provide a self-sufficiency continuum that is integrated and holistic, designed to assist individuals to acquire the skills and competencies to secure a sustainable wage. PRHA's current self-sufficiency program connects residents with an array of support services. However, the traditional FSS Program incentivizes individuals through an escrow created only as a result of increased earned income. Recognizing that self-sufficiency is achieved through economic mobility PRHA's FII Program will provide intermediate financial incentives for self-initiatives such as continued education, technical training certifications; complying with a personal budget and increased credit scores; and securing new employment with higher sustainable wages.

A local agreement will be implemented that articulates PRHA's goals for its FII program. The new agreement will address revised escrow earnings based on the intermediate financial incentives. A fixed schedule of values will be established for each initiative. Payment will be made to the participant's escrow upon successful completion of the corresponding goal. The escrow account will be paid in full only upon graduation from the FSS program. Non-compliance with the FSS program requirements as well as the termination from the public housing or voucher programs will result in forfeiture of the escrow.

Graduation from the FSS program will be defined as suitable employment maintained for six consecutive months and no one in the household is no longer receiving any TANF benefits. Suitable employment will be negotiated with each participant and stated in the agreement upon execution of the agreement.

Current FSS participants will be provided with the option of remaining in the traditional FSS program until graduation under the current requirements or transferring to the Family Independence Initiative. If a family chooses to transfer to the FII

program, their accumulated escrow will transfer as well.

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

Self-sufficiency

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

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

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

Currently assisted households only

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

The MTW activity applies to all family types

**Does the MTW activity apply to all public housing developments?**

The MTW activity applies to all developments

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

Year 1 of Implementation focused on staff training and updating software. There was a delay with our software provider.

PRHA intends to fully implement changes in the current year which will lead to more quantifiable accomplishments.

**Does this MTW activity require a hardship policy?**

No

No document is attached.

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

No

**Does the MTW activity require an impact analysis?**

No

No document is attached.

**10.d.HCV - Modify or Eliminate the Contract of Participation (HCV)**

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

The Portsmouth Redevelopment and Housing Authority will eliminate the Family Self-Sufficiency (FSS) Program Contract of Participation and replace the traditional FSS escrow calculation with a flat payment system to address increases in family income.

The Family Independence Initiative (FII) will provide a self-sufficiency continuum that is integrated and holistic, designed to assist individuals in acquiring the skills and competencies to secure a sustainable wage. PRHA's current self-sufficiency program connects residents with an array of support services. However, the traditional FSS Program incentivizes individuals through an escrow created only as a result of increased earned income. Recognizing that self-sufficiency is achieved through economic mobility PRHA's FII Program will provide intermediate financial incentives for self-initiatives such as continued education, technical training certifications; complying with a personal budget and increased credit scores; and securing new employment with higher sustainable wages.

A local agreement will be implemented that articulates PRHA's goals for its FII program. The new agreement will address revised escrow earnings based on the intermediate financial incentives. A fixed schedule of values will be established for each self-initiative. Payment will be made to the participant's escrow upon successful completion of the corresponding goal. The escrow account will be paid in full only upon graduation from the FSS program. Non-compliance with the FSS program requirements as well as the termination from the public housing or voucher programs will result in forfeiture of the escrow.

Graduation from the FSS program will be defined as suitable employment maintained for six consecutive months and no one in the household is no longer receiving any TANF benefits. Suitable employment will be negotiated with each participant and stated in the agreement upon execution of the agreement.

Current FSS participants will be provided with the option of remaining in the traditional FSS program until graduation under the current requirements or transferring to the Family Independence Initiative. If a family chooses to transfer to the FII

program, their accumulated escrow will transfer as well.

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

Self-sufficiency

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

The MTW activity applies only to a subset or subsets of assisted households
<b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b> Currently assisted households only
<b>Does the MTW activity apply to all family types or only to selected family types?</b> The MTW activity applies to all family types
<b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b> The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
<b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b> All HCV units, Hamilton Place, Hope Village, Dale Homes, King Square
<b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b> Year 1 of Implementation focused on staff training and updating software. There was a delay with our software provider. PRHA intends to fully implement changes in the current year which will lead to more quantifiable accomplishments.
<b>Does this MTW activity require a hardship policy?</b> No  No document is attached.
<b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b> No
<b>Does the MTW activity require an impact analysis?</b> No  No document is attached.

<b>17.c. - Housing Development Programs</b>
<b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b> The Portsmouth Redevelopment and Housing Authority will utilize MTW funding to expand affordable housing in the City of Portsmouth through acquisition, substantial rehabilitation and/or new construction of single-family and multi-family housing units. Funds will be used as secondary financing for tax credit projects with PRHA Project Based Vouchers.
<b>Which of the MTW statutory objectives does this MTW activity serve?</b> Housing choice
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b> Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

Year 1 of Implementation focused on staff training and updating software. There was a delay with our software provider.

PRHA intends to fully implement changes in the current year which will lead to more quantifiable accomplishments.

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

No

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

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Lexington Seniors	New Construction	Gap Financing	105.00	105.00	99.00	0.00	6.00	0.00
Swanson Homes Redevelopment	New Construction	GAP Financing	100.00	200.00	100.00	0.00	0.00	0.00
Twin Pines	New Construction	Gap Financing	82.00	82.00	82.00	0.00	0.00	0.00
High Street Single Family Homeownership	New Construction	Gap Financing	4.00	4.00	4.00	0.00	0.00	0.00
Lexington Seniors	New Construction	GAP Financing	105.00	105.00	99.00	0.00	6.00	0.00
High Street Single Family Development	New Construction	GAP Financing	4.00	4.00	4.00	0.00	0.00	0.00
Swanson Homes Redevelopment	New Construction	GAP Financing	200.00	100.00	100.00	0.00	0.00	0.00

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

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

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

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<p><b>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</b></p> <p>Yes, the Safe Harbor Waiver request(s) for 1d, 3a, 3b is(are) attached.</p>

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

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

<b>Federal Fiscal Year (FFY)</b>	<b>Total Operating Subsidy Authorized Amount</b>	<b>How Much PHA Disbursed by the 9/30 Reporting Period</b>	<b>Remaining Not Yet Disbursed</b>	<b>Deadline</b>
2023	\$2,429,928	\$1,877,611	\$0	2023-12-31

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

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

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>

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

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

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?

<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>	
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.		
		<b>Occupied Number of Local, Non-Traditional units by</b>

<b>Family Size:</b>	<b>Household Size</b>
1 Person	
2 Person	
3 Person	
4 Person	
5 Person	
6+ Person	
Totals	<b>0</b>

<b>H.</b>	<b>Public Comment</b>
	Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.
	No additional public hearing was held for an Agency-Specific Waiver and/or Safe Harbor waiver

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

# PORTSMOUTH REDEVELOPMENT AND HOUSING AUTHORITY

## MOVING TO WORK SUPPLEMENT 2022-2023

### HARDSHIP OVERVIEW

The Portsmouth Redevelopment and Housing Authority recognizes that several policies implemented under the Moving to Work flexibilities may have an adverse impact on some households. This hardship policy is designed to minimize any negative impact the MTW policies may have on assisted households.

The chart below identifies the MTW activities that could negatively impact assisted families and the groups to which the hardship for each activity will apply.

Hardship Policy	Study Group	Standard Group	Excluded Group
Hardship Process	✓	✓	✓
Rent Burden at Enrollment	✓		
Rent Burden after Enrollment	✓		
Stepped Rent Reset for Sustained Hardships	✓		
Full-time Student Hardship	✓		
Payment Standards	✓	✓	✓
Alternate Re-certifications	✓	✓	✓
Alternative Verification Hardship	✓	✓	✓

**Study Group** – Non-elderly, non-disabled households randomly selected and not otherwise excluded, from the Stepped Rent study. Rent for these households will be determined based on the Stepped Rent policy described in Activity 1a and 1 b in the MTW Supplement.

**Standard Group** - Non-elderly, non-disabled households NOT randomly selected and not otherwise excluded, from the Stepped Rent study. Rent for these households will be based on the standard HUD rent calculation regulations.

**Excluded Group** - All elderly, disabled, traditional FSS and special purpose vouchers as well as households who become or will become elderly or disabled during the six year study period are excluded from the random selection. Where special purpose vouchers are concerned, PRHA will apply MTW policies to the extent that such policies are not in conflict with the applicable NOFA. In the event of a conflict, the NOFA will govern.

**New Admissions** – Households newly admitted to the Public Housing and HCV programs after the commencement of the Stepped Rent study, will be randomly selected at the time of admission.

A hardship review committee will be established by PRHA that will be responsible for the review and approval or denial of all hardship requests received under this policy.

This hardship policy presents eligibility criteria and remedies for different types of hardships. The different types of hardships below are not mutually exclusive. If a household's circumstances correspond to more than one type of hardship, they will receive the hardship most beneficial to them.

## **HARDSHIP POLICIES**

PRHA will review its hardship policies with families during initial eligibility and triennial recertifications. PRHA will review all proposed program terminations/eviction for non-payment of rent and consider if a household qualifies for a hardship exemption prior to a final termination or eviction.

- There is no limit to the number of hardships that a household may request and receive.
- If a household is approved for a hardship, and subsequently experiences another adverse event while still in hardship status, they may request an additional hardship that might impact their total tenant payment (TTP).
- If a household is approved for a hardship, they are not required to report subsequent income increases during the period of their approved hardship; the hardship rent will remain in effect until the end of the time period approved for the hardship.
- If a household is approved for a temporary hardship, when that hardship is scheduled to expire the household will be notified and may request an extension. When a hardship expires, the household will return to paying the stepped rent, including any annual stepped rent TTP increases that occurred during the period of the hardship.
- If the head of household, spouse, or co-head of household becomes elderly or disabled, the household is eligible to be excluded from the stepped rent and return to the traditional income-based rent policy.

## **HARDSHIP REQUEST AND APPROVAL PROCESS**

Households who request a hardship will be subject to the hardship process outlined below.

- All hardship requests must be in writing with the exception of automatic hardship processed by PRHA during the income certification that takes place at initial enrollment.
- When a household makes a written request for a hardship exemption from a required MTW activity, PRHA will request verification of the hardship.
- Households will be required to provide verification of the hardship within 14 calendar days from the date of the hardship request.
- Within 14 calendar days from receipt of verification of the hardship, PRHA will make a determination as to whether or not to grant the hardship.

- Approved hardships will take place on the first of the month after the hardship is approved. If there is a delay in determining the hardship, through no fault of the household, PRHA will make the hardship TTP retroactive to the first of the month following receipt of the verified request.
- The hardship TTP will be calculated consistent with applicable PRHA hardship policies described further below and will remain in effect for the period of time for which the hardship has been granted.
- If a hardship request is denied, PRHA will provide the household with an opportunity to request an informal review for a second level review of the denied hardship request.
- If a hardship continues beyond the initial approval period and the household does not reapply or is not approved for a continued hardship, the rent will revert back to the pre-hardship stepped rent TTP, plus any annual stepped rent TTP increases that were scheduled to take effect during the hardship period.
- PRHA will retain records of all hardship requests received and the results of these requests and supply them at HUD's request. PRHA will retain this information for the duration of PRHA's participation in the MTW demonstration program and make such information available for public review and inspection at PRHA's principal office during normal business hours.

## **HARDSHIP TYPES, CRITERIA AND REMEDIES**

**Stepped Rent Childcare Expenses** – This hardship type applies only to households enrolled in the Stepped Rent demonstration. Households that are eligible for a Childcare Expense hardship type will receive a permanent TTP reduction, by “resetting” their stepped rent TTP.

1. **Enrollment** - When a household converts from the standard rent calculation to the stepped rent policy and had more than \$2,500 of childcare deductions at their previous recertification, and the household continues to pay more than \$2,500 in childcare, PRHA will deduct the actual childcare expenses from their current gross income before setting the year 1 stepped rent.
2. **Hardship Request** – Any household that did not have more than \$2,500 in childcare at the time of establishing their initial step rent and subsequently has more than \$2,500 in childcare expense, may request a hardship.
  - A household may not receive a hardship for childcare deduction more than twice over the 6-year period of the Stepped Rent demonstration. If a household has already received this hardship exemption once, they will be eligible for a second stepped rent reset if their eligible childcare expenses have increased by at least \$2,500 since the last time their stepped rent was reset.

- PRHA will subtract the eligible childcare deductions from the household's current gross income and calculate a new TTP at the higher of the minimum rent or 30% of that childcare-adjusted income. This will not be a temporary hardship; it will apply for 12 months, and establish a new base on which future stepped rent annual increases will be applied.

**High Rent Burden** – This hardship type applies only to households enrolled in the Stepped Rent demonstration. Households participating in the stepped rent will be eligible for a temporary hardship exemption if the stepped rent causes a rent burden above 40% of their annual gross income.

- 1. Enrollment** - When a household converts from the standard rent calculation to the stepped rent policy PRHA will conduct a recertification. If the household's current gross income is lower than their retrospective gross income and their TTP will exceed 40% of their monthly gross income, the household will automatically qualify for a hardship exemption.
- 2. Hardship Request** - At any time other than the recertification at conversion the household's TTP will exceed 40% of their monthly gross income, a hardship must be requested in accordance with the procedures set forth above.

- PRHA will set equal the households TTP to to 40% of their current gross monthly income or the minimum rent, whichever is greater.
- The hardship exemption under this criterion will be for a temporary period of ninety days. The household may request an extension or reapply for another hardship under this criteria

**Sustained Hardships** - This hardship type applies only to households enrolled in the Stepped Rent demonstration. If a hardship is approved on a temporary basis based on rent burden and the family has been granted extension of the temporary hardship and the hardship condition continues for 12 consecutive months, PRHA's hardship review committee will determine on a case-by-case basis if the stepped rent will be reset.

- PRHA will calculate a new stepped rent TTP at the higher of the minimum rent or 30% of prior year/retrospective gross income. The resulting TTP will apply for 12 months and will establish a new base on which future stepped rent annual increases will be applied. This action will establish a new annual cycle for the household's stepped rent increases.

**Other Circumstances** - This hardship policy applies to all MTW activities listed in the chart on page one. A household may request a hardship exemption for other circumstances not outlined above. PRHA will consider these requests on a case-by-case basis and decisions will be made by the hardship review committee.

- The hardship review committee will determine if the circumstances are beyond the household's control and make it difficult for the household to pay the stepped rent TTP, and whether a temporary rent reprieve is necessary.
- If it is determined that a hardship does exist, PRHA will set the household's TTP to a flat \$100 for one month.



## Quality Assurance

For quality assurance purposes, a staff supervisor will review all rent reasonable determinations by staff for PRHA-controlled units with tenant-based vouchers. Documentation will include a worksheet that identifies all key criteria of comparable units with the subject unit that justifies the rent amount. and attached for the quality assurance method

Bedroom Size	0	1	2	3	4+
Annual Step Rent Increase	\$25	\$30	\$35	\$40	\$50

**PORTSMOUTH REDEVELOPMENT AND HOUSING AUTHORITY**  
**MOVING TO WORK SUPPLEMENT 2023 – SAFE-HARBOR WAIVER**

**Summary**

The Portsmouth Redevelopment and Housing Authority is requesting a Safe Harbor Waiver for Activities 3a and 3b, Alternate Reexamination Schedule for Public Housing and Housing Choice Voucher Program.

The standard MTW waiver provides that when an alternate recertification schedule is established, one interim recertification per year is required if household gross income decrease by 10% or more.

PHA is requesting a waiver from the requirement of one interim recertification per year.

**Description of Standard MTW Waiver**

The agency may establish an alternative reexamination schedule for households.

**Statutes and Regulations Waived**

Public Housing Applicable Regulations – certain provisions of sections 3(a)(1) and 3(a)(2) of the 1937 Act and 24CFR960.257 (a) and (ba).

Housing Choice Voucher Applicable Regulations – certain provisions of sections 8(o)(5) of the 1937 Act and 24CFR982.516(a)(1) and 982.516 (c)(2).

**Safe Harbors**

- i. Reexaminations must occur at least every three years.
- ii. The agency must also allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more.
- iii. Agency must implement an impact analysis.
- iv. Agency must include a hardship policy.

**Requested Safe Harbor Waiver and Explanation**

PRHA is requesting this Safe Harbor waiver to enable participation in the Rent Reform demonstration study. This waiver will apply to households who are not otherwise exempt or excluded and who are randomly selected to pay rent under the Stepped Rent policies.

The study requires PRHA along with the other demonstration agencies to conduct a recertification for continued eligibility purposes only on a triennial basis. Rather than providing an interim recertification one each year as required under the Safe Harbor provisions, the Stepped Rent policies will provide for the family to request a hardship under PRHA's Hardship Policy if they experience a decrease in income that will create a rent burden in excess of 40% of the household's current monthly gross income.



December 20, 2023

Brandon L. Ballard  
Equal Justice Housing Fellow Attorney  
Legal Aid Society of Eastern Virginia  
125 St. Paul's Blvd., Suite 400  
Norfolk, VA 23510

Dear Mr. Ballard:

The Portsmouth Redevelopment & Housing Authority (PRHA) appreciates your review and comments on the 2024 Agency Plan and Move to Work Supplement. The comments were reviewed carefully and changes and clarifications were made where appropriate. Please find below PRHA's response to the comments provided by the Legal Aid Society of Eastern Virginia (LASEV).

- **Repayment Plan Down Payment Requirement for Project-Based Voucher and Housing Choice Voucher Participants under the Administrative Plan.**
  - Chapter 16 of the Administrative Plan was inadvertently omitted from the Agency Plan. In that regard, any changes to the requirements for down payments under repayment agreements will be revisited during the next update of the Agency Plan.
- **Applicability of MTW Hardship Process Described in the MTW Supplement.**
  - Similar to the MTW hardship process, there is a process in place for families identified as "Standard/Study Group" under MTW. The families will follow the Hardship Exemption from the Minimum Rent Policy that is currently in place to assist families who are unable to pay the minimum rent. Please refer to Chapter 6 beginning on page 53 of the Admissions and Continued Occupancy Plan.
- **Public Housing Residents' Knowledge of the Hardship Exemption from the Minimum Rent Policy.**
  - It is the intent of PRHA at all times to make certain that our participants and residents are fully aware of and understand our policies. Therefore, PRHA will place language on the rent notification letters reminding residents of the hardship exemption from the minimum rent.
- **PRHA's Review of Section 8 Landlords' Leases**
  - Although PRHA is not a party to the lease, Landlords participating in the HCV program are required to submit their lease to PRHA. Staff will review certain

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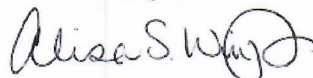


elements in the lease to ensure consistency with what was submitted on the RFTA. PRHA caseworkers are not equipped to deal with any legalities related to the lease which is why PRHA incorporated in the Administrative Plan that it is the owner's responsibility to comply with state/local law per the Virginia Resident Landlord Tenant Act. The HCV tenancy addendum is a HUD form and cannot be altered to include signatures.

- **PRHA Should Ensure its Notices of Inspection Failures Issued to Section 8 Landlords and Tenants Clearly Convey Who is Responsible for Which HQS Violations.**
  - PRHA appreciates LASEV bringing this concern to our attention. PRHA staff will clearly identify which party is responsible for the violation. In addition, as suggested, PRHA will cc the tenant and send the same notice issued to the landlord. We hope this will cut down on any confusion between the tenant and landlord regarding HQS inspections.
  
- **Overall Status of MTW Program**
  - Based on LASEVA recommendation, PRHA will include an MTW participant summary report in future updates to the Agency Plan. There are currently 155 participants MTW participants of which 77 are Stepped Rent participants. There have been no families that requested hardships; however, seven (7) participants received automatic hardship due to their portion of rent being over 40% of their income. PRHA does plan to implement the MTW policies as identified in the supplement. It should be noted that PRHA has experienced delays with our software provider which has led to delays with the full implementation of the MTW program. HUD is assisting in this effort and we hope that the software will be fully operational for the MTW program within the 1<sup>st</sup> quarter of 2024.

Again, we appreciate the feedback that LASEV provided to PRHA. We will continue to review HUD guidance, updates, and policy and where deemed necessary make the clarifications and revisions throughout the Annual Agency Plan and MTW supplement process. If you require any additional clarification, please feel free to contact me.

Best Regards,



Alisa Winston  
Executive Director

**Resident Advisory Board (RAB)**  
**3116 South Street**  
**Meeting Minutes**  
**December 11, 2023**  
**3:00 p.m.**

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**Attendance:**

**RAB Members:** Patrice Beale, Ebony Williams, Deborah Killebrew, Dorothy Morgan, Gladys Cross, Edith DeLoach

**PRHA Staff:** Alisa Winston, Valzenia Jenkins, Consuela Knight, Erika Thomas, Ebony Cannon, Tracy Christian

Ms. Winston opened the meeting with a presentation of the 2024 Agency Plan and Moving to Work (MTW) Supplement. A Public Housing Authority (PHA) Agency Plan is required and provides a roadmap and a guide to what Portsmouth Redevelopment and Housing Authority (PRHA) will do with the Department of Housing and Urban Development (HUD) funds. HUD wants to see that the Authority engages with program participants and residents.

Ms. Winston noted the process was to provide a draft plan, provide a notice of a public hearing and notice, and have a 45-day comment period. HUD requires the PHA to meet with the Resident Advisory Board. Ms. Winston reminded the RAB that their comments would be a part of the plan.

Ms. Winston explained the three parts of the PHA Plan, which include the Five-Year Plan, Annual Plan, and Move to Work (MTW) Supplement. She explained that PRHA continued to achieve the mission and goals identified in the PHA plan. The goals were to expand the supply of assisted housing, improve the quality of assisted housing, increase assisted housing choices, and improve community quality of life and economic vitality.

Ms. Winston highlighted events happening in the next year. The development of Lexington Seniors was anticipated to be completed in late 2026 (18 months). PRHA secured demolition deposition approval from HUD for Swanson Homes. PRHA added 18 Emergency Housing Vouchers for those who are homeless. PRHA continued to reach out to potential landlords by providing workshops and implementing incentives.

Ms. Winston reminded the RAB that PRHA will be under the stepped rent program for MTW. It's a study where HUD wants to see if they take off restrictions will that create more opportunities to be self-sufficient. It is a six-year program that will be monitored on the impact, implementation, and cost.

HUD recognizes that certain groups need to be excluded. Ms. Winston shared that non-elderly, non-disabled, current housing subsidy recipients and new admissions, housing choice voucher program, and public housing program will be eligible for the study.

Ms. Winston provided an example of how stepped rent will not be tied to their income. There's an incentive to increase income because instead of being reviewed every year, it will be reviewed every three years.

Ms. Winston explained that hardships can be requested if the rent exceeds 40% of their residents' income.

Ms. Jenkins, Director of Asset Management presented the following Summary of Changes for the ACOP:

**Chapter 4 – Applications, Waiting List and Tenant Selection:**

**Page 10 – Reopening the Waitlist** – Changed the number of days that PRHA will announce the reopening of the waiting list from 5 days to 7 days. Also, removed the New Journal and Guide and added PRHA Website and social media.

**Chapter 6 – Income and Rent Determination:**

Page 14 – added, effective 1/1/2024, EID rules will no longer apply due to HOTMA preferences.

**Chapter 7 – Verifications:**

**Page 11 – Self-Certification** – PRHA will allow applicants and residents to self-certify all assets \$50,000 and below.

**Page 27 – Zero Annual Income Status** – Added families reporting zero income are required to undergo an interim recertification every 180 days (6 months).

**Chapter 11 – Community Service:**

**Page 2- Requirements** – Added to the definition of Exempt Individual, a non-public housing over-income family may be exempt.

**Chapter 13 – Lease Terminations:**

**Page 8- Over Income Families** – PRHA will terminate families whose income exceeds the over-income limit for 24 consecutive months.

**Page 9 – Decrease in income - If**, at any time during the 24-month period following the initial over-income determination, an over-income family experiences a decrease in income, the family may request an interim redetermination of rent in accordance with PHA policy in Chapter 9.

If, as a result, the previously over-income family is now below the over-income limit, the family is no longer subject to over-income provisions as of the effective date of the recertification. The PHA will notify the family in writing within 10 business days of the determination that over-income policies no longer apply to them.

**Page 9 – Initial Notice of Over-Income Status [24 CFR 960.5079(c)(1)] - PHA Policy**

At annual or interim reexamination, if a family's income exceeds the applicable over income limit, within 10 business days the PHA will notify the family in writing of the determination and that if the family continues to be over-income for 24 consecutive

months, the family will be subject to the PHA's over-income policies. The notice will state that the family may request a hearing if the family disputes the PHA's determination in accordance with PHA policies in Chapter 14.

**Page 10 – Second Notice of Over-Income Status [24 CFR 960.507(c)(2)** - If a family's income exceeds the applicable over-income limit after 12 consecutive months, within 10 business days, the PHA will notify the family in writing of the determination and that if the family continues to be over-income for 24 consecutive months, the family will be subject to the PHA's over-income policies.

**Page 11 – Final Notice of Over-Income Status [24 CFR 960.507(c)(3) and 960.509]** - If a family's income exceeds the applicable over-income limit for 24 consecutive months, the PHA will notify the family in writing of the determination within 10 business days of the date of the determination. The notice will state that the family will be charged the alternative non-public housing rent in accordance with PHA continued occupancy policies and HUD regulations and provide the family's new rent amount or termination of lease.

Ms. Knight, Director of HCV Program discussed the following Summary of Changes to the Admin Plan:

Chapter 4- Opening and closing the Waiting List – The same as public housing

Chapter 4 – Selection and HCV Funding Resources – 4-10 – Updated all of the Tenant Based Voucher and Special Programs

- Mainstream Disabled
- Mainstream Elderly
- Veteran Affairs Supportive Housing (VASH)
- Emergency Vouchers
- Family Unification Vouchers
- Non-Elderly Disable Vouchers

Chapter 4 – Eligibility Requirement of Mainstream Vouchers

Chapter 4 – Notification of Selection

The public housing applicants process has been added to the Administrative Plan

Chapter 5 – Exceptions to Subsidy Standards – Determination of days changed from 10 business days to 15 business days

Chapter 5 – Voucher Term and Extensions – Changed from 60 days to 90 days searching for voucher issuance

Chapter 5 – Extension of Voucher Term – 30 days first extension request from family.

30 days for a second extension – reasonable accommodation not to exceed 180 days

Chapter 5 – Expiration of Voucher Term – Policy changes 10 business days to 15 business days

Chapter 6 – Earned Income Disallowance – The earned income disallowance ends 01/01/2024 – The same as public housing

Chapter 6 – Assets

5,000 Self-certification – checking account, saving account, Stocks, Bonds, Saving Certificates and Money Market Funds, Equity in Real Property and Other Capital Investments – Equity (Cash Value) and Trusts

Chapter 7 – Zero Income Certification – 180 days every 6 months

Chapter 8 – Inspection Cost - PRHA will charge a fee for failed re-inspections The first reinspection cost will be \$25.00. The second reinspection cost will be \$50.00 and all subsequent reinspection will be \$50.00 each.

Remote Video Inspections – PRHA will not participate in RMI

Initial Inspections – PRHA will not rely on alternative inspections and will conduct an HQS inspection for each unit prior to executing a HAP contract with the owner.

Utilities – The requirements for all utilities to be on for initial inspections

Chapter 9 – It is the owner's responsibility to comply with state/local law accord to the Virginia Resident Landlord Tenant Act.

Chapter 10 – Portability – Sending documentation of legal identity

Initial Contact with Family – Policy changes 15 calendar days

Briefing – PRHA portability families will not be required to attend a briefing

Chapter 12 – Termination Notice – Voluntarily Termination – 15 business days' notice

Termination of Assistance of Contract – The owner may offer the family a separate unassisted lease.

Emergency Housing Voucher requirements have been added to the Administrative Plan.

Ms. Winston asked if there were any concerns regarding the Agency Plan or any other items.

Ms. Morgan expressed concerns about Phoebus Square, drug activity, and security. Ms. Jenkins said she would follow up with the property manager on Ms. Morgan's behalf. Ms. Morgan also mentioned issues with her stove and Ms. Winston and Ms. Jenkins said they would follow up on that with Maintenance.

There was also mention that Rent Pay would not accept (Visa) and because of this, pay or move notices were issued. Ms. Winston and Ms. Jenkins said that they would have IT look into this.

Ms. Williams expressed a concern about bug infestation at Hamilton Place due to some neighbors. Ms. Jenkins said she would follow up with the property manager. Ms. Killebrew also of Hamilton Place mentioned concern for what seemed to be drug transactions happening in the building. Ms.

Winston said that the cameras should record the activity. However, if anyone sees anything try to remember the time and then it will make it easier to locate on the video.

Ms. Winston also said she didn't want anyone to put themselves in danger to report anything as the resident's safety comes first. Ms. Williams said she gets license plate numbers and watches the time. Ms. Williams said she has no problem relaying what she sees to the property Manager.

**No other comments or concerns and the meeting adjourned at 4:17 p.m.**

## RENT REASONABLENESS DETERMINATION

PRHA will utilize the third-party market studies submitted to lenders and investors for new projects to be developed under the PBV program. Rent for existing PBV properties and owner-requested rent increases, will be based on the market rate rent in the property, if applicable, with no further comparison required. For properties with no market-rate units, PRHA will secure a property-specific rent comparability study.

In the Tenant-Based Voucher Program, PRHA will ensure that the rent charged for PRHA-controlled units is never higher than the applicable amount under the MTW Alternate Payment Standards. PRHA will review the average rent for similar properties within its voucher program when determining the reasonableness of the rent charged for PRHA-controlled units. and attached for the rent reasonableness determination method

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (01/01/2024), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

Portsmouth Redevelopment & Housing Authority

VA001

**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).*

Alisa Winston

Executive Director

**NAME OF AUTHORIZED OFFICIAL**

**TITLE**

*Alisa Winston*

12/21/23

**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.*

**RESOLUTION 2023-44      RESOLUTION    ADOPTING    THE    PORTSMOUTH  
REDEVELOPMENT    AND    HOUSING    AUTHORITY'S  
ANNUAL AGENCY PLAN FOR FISCAL YEAR 2024 AND  
APPROVAL OF MOVING TO WORK SUPPLEMENT**

**WHEREAS**, Section 511 of the Quality Housing and Work Responsibility Act of 1998 (QHWRA) requires housing authorities to provide its residents, community, and the Department of Housing and Urban Development a comprehensive agency plan that consists of a Five-Year Plan and an Annual Plan;

**WHEREAS**, the Annual Agency Plan provides a forum to present the policies and procedures of the Authority;

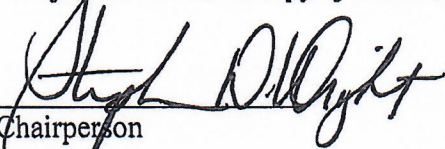
**WHEREAS**, the Portsmouth Redevelopment and Housing Authority was notified that it was selected for admission to the Moving to Work Demonstration Program, Cohort #2: Rent Reform to study Stepped Rent;

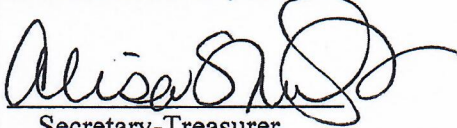
**WHEREAS**, participation in the Moving to Work Demonstration requires a Moving to Work Supplement to the Annual Agency Plan;

**WHEREAS**, PRHA posted the draft of the 2024 Annual Agency Plan and MTW Supplement to the Agency Plan on October 27, 2023, accepted public comments through December 12, 2023; and conducted a public hearing on December 5, 2023;

**NOW THEREFORE BE IT RESOLVED** that the Board of Commissioners of the Portsmouth Redevelopment and Housing Authority ("PRHA") do hereby approve the Annual 2024 Agency Plan and the Moving to Work Supplement as attached hereto and authorize the Secretary of the Board of Commissioners to execute the MTW Certifications of Compliance.

*Certified to be a true copy of a resolution adopted on December 21, 2023.*

  
Chairperson

  
Secretary-Treasurer

(Seal)