

# PHA Name : Portsmouth Housing Authority

**PHA Code :** NH004

**MTW Supplement for PHA Fiscal Year Beginning :** (MM/DD/YYYY): 1/1/2025

**PHA Program Type:** Combined

**MTW Cohort Number:** MTW Flexibility for Smaller PHAs II

**MTW Supplement Submission Type:** Annual Submission

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

In the spring of 2024, the Portsmouth Housing Authority (PHA) became one of 14 Housing Authorities (HAs) nationwide to join the final phase of HUD's Moving to Work (MTW) program. This initiative will enable PHA to implement innovative strategies and policy changes to reduce bureaucratic hurdles, enhance customer service, and manage costs effectively. These measures will help us better cater to Portsmouth's unique needs by investing in programs that boost the capacity and resilience of our residents, support new affordable housing projects, or develop new initiatives for families, seniors, workers, and individuals with disabilities.

Participation in the MTW program is highly selective, offered only to top-performing housing agencies like PHA. Now, PHA stands among just 139 MTW agencies out of over 3,000 Public Housing Authorities in the United States. Some of our goals include:

**Cost Effectiveness:** PHA plans to adopt alternative and streamlined utility allowance models, benefiting participants, reducing administrative burdens for staff, and saving costs for the agency.

**Self-Sufficiency:** Using the MTW program, PHA will explore additional flexibilities and incentives to further enhance Family Self-Sufficiency (FSS) program goals and established benchmarks for success.

**Housing Choice:** Pursue flexibilities concerning payment standards and rent reasonableness determinations.

The challenges faced by PHA and the Portsmouth community highlight the necessity to modernize our public housing portfolio, which is over fifty years old, while addressing the urgent demand for more permanently affordable and accessible housing in the city. The flexibility provided under the MTW Program encourages PHA to develop and implement innovative solutions to these needs, including securing additional resources to tackle the acute housing crisis in our region. PHA is currently formulating a seven-year plan for implementing the Rental Assistance Demonstration (RAD) program to achieve development targets by the end of this decade. Utilizing relevant MTW waivers will allow PHA to transition to RAD effectively while redeveloping, rehabilitating, expanding, and repositioning our public housing portfolio. MTW waivers will offer more efficient and robust tools for optimal long-term use of rental assistance.

PHA is also actively exploring opportunities for new affordable housing developments in Portsmouth and preserving existing affordable housing in the city. Our goal is to apply for a Low-Income Housing Tax Credit (LIHTC) allocation in the fall of 2024, aiming to put new units into service by late 2026.

**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)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Plan to Implement in the Submission Year
n. Utility Reimbursements (HCV)	Plan to Implement in the Submission Year
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	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)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Plan to Implement in the Submission Year
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
<b>3. Reexaminations</b>	
a. Alternative Reexamination Schedule for Households (PH)	Not Currently Implemented
b. Alternative Reexamination Schedule for Households (HCV)	Not Currently Implemented
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Not Currently Implemented
<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)	Not Currently Implemented
<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)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
<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)	Plan to Implement in the Submission Year
b. Increase PBV Project Cap (HCV)	Plan to Implement in the Submission Year
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Plan to Implement in the Submission Year
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
<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)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<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	Not Currently Implemented
b. Service Provision	Not Currently Implemented

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

1.m. - Utility Reimbursements (PH)
<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>This would allow us to eliminate utility reimbursement payments in these programs when the utility allowance is greater than the total tenant payment. This would relieve the administrative burden of managing these, including issuing checks to tenants or the utility and voiding/reissuing stale dated checks some tenants don't cash. This will also increase revenue for the authority while making households more self-reliant.</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 revenue; 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>N/A - This is a new implementation.</p>

1.n. - Utility Reimbursements (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>This would allow us to eliminate utility reimbursement payments in these programs when the utility allowance is greater than the total tenant payment. This would relieve the administrative burden of managing these, including issuing checks to tenants or the utility and voiding/reissuing stale dated checks some tenants don't cash. This will also increase revenue for the authority while making households more self-reliant.</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 revenue; 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>

N/A - This is a new implementation.

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

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

The PHA will raise the payment standard to 120% of the Fair Market Rents (FMR) for Tenant-Based Vouchers (TBV), Project-Based Vouchers (PBV), and Foster Youth to Independence Vouchers (FYI). Housing choices are dwindling due to increased local market rents, and this restricts where PHA households can live. This activity is a remedy to that concern. This should also reduce the rent burden on tenants and shorten the family's time on the waiting list.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

N/A - This is a new implementation.

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

Yes

This document is attached.

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

No

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

No

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

No hardship were requested in the most recent fiscal year.

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

No

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

Yes

This document is attached.

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

No

**Please explain the payment standards by FMR:**

The current PHA payment standard is 110% of the FMR. A payment standard of 120% of the FMR will increase the payment standard by an average of \$83 for all bedroom sizes.

SRO unit FMR is \$1,106; current payment standard (PS) is \$1,222; PS for 120% of FMR would be \$1,328.

0-bedroom FMR is \$1,475; current PS is \$1,629; PS for 120% of FMR would be \$1,770.

1-bedroom FMR is \$1,517; current PS is \$1,740; PS for 120% of FMR would be \$1,820.

2-bedroom FMR is \$1,961; current PS is \$2,203; PS for 120% of FMR would be \$2,353.

3-bedroom FMR is \$2,429; current PS is \$2,813; PS for 120% of FMR would be \$2,915.

4-bedroom FMR is \$2,749; current PS is \$3,299; PS for 120% of FMR would be \$3,299.

5-bedroom FMR is \$3,161; current PS is \$3,794; PS for 120% of FMR would be \$3,793.

**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**

Under this activity, Portsmouth Housing Authority plans to increase the number of authorized units that allow vouchers to be project-based to encourage development in underserved communities in Portsmouth.

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

Housing choice

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

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 only to a subset or subsets of assisted households

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

New admissions and currently assisted households

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

The MTW activity applies to all family types

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

The MTW activity applies to all 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.**

N/A - This is a new implementation.

**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**

This will allow PHA to allow up to 100% of units in a project to be placed under a PBV Housing Assistance Payments contract. PHA may eliminate or raise the project cap for those PBV projects that the agency determines to be consistent with the goal of increasing housing choice for Housing Choice Voucher program participants. PHA may eliminate or raise the project cap for projects located in high opportunity areas, City-designated revitalization areas, in conjunction with PHA-sponsored development activities and for other factors as determined by PHA. PHA will continue to be subject to the applicable provisions of PIH Notice 2013-28 or successor notices. This activity supports the goal of increasing housing choice.

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

Housing choice

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

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 only to a subset or subsets of assisted households

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

New admissions and currently assisted households

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

The MTW activity applies to all family types

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

The MTW activity applies to all 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.**

N/A - This is a new implementation.

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

No

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

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

This will allow PHA to eliminate the selection process in the award of Project Based Vouchers to properties owned by PHA that are not public housing without engaging in an initiative to improve, develop or replace a public housing property or site. PHA may award PBVs to projects meeting these criteria based on approval by the PHA Board of Commissioners and provided that: 1) A subsidy layering review is performed where required by regulation; 2) PHA completed site selection requirements; 3) HQS (or successor standards) inspections shall be performed by an independent entity (unless waived pursuant to an MTW waiver); and, 4) The property is owned by a single-asset entity of PHA in conformance with HUD PIH Notice 2017-21 or successor notice. PHA shall continue to be subject where applicable to HUD PIH Notice 2013-27 or successor notice. The PHA goals for this activity are to increase housing choice and to streamline and make operations more cost effective.

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

Cost effectiveness; Housing choice

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

Neutral (no cost implications)

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

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

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

New admissions and currently assisted households

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

The MTW activity applies to all family types

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

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

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

PHA plans to implement this MTW flexibility for qualified projects in the future.

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

N/A - This is a new implementation.

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

No

<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>No Safe Harbor Waivers are being requested.</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</p>

E.2	<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> No</p>

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2024	\$1,418,877	\$1,418,877	\$0	2024-09-30

<b>G.</b>	<b>MTW Statutory Requirements.</b>	
<b>G.1</b>	<b>75% Very Low Income – Local, Non-Traditional.</b> HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	<b>Income Level</b>	<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
	80%-50% Area Median Income	0
	49%-30% Area Median Income	0
	Below 30% Area Median Income	0
	<b>Total Local, Non-Traditional Households</b>	<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>
<p><b>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?</b> No</p> <p><b>Please describe the MTW agency's plans for its future rent reform activity and the implementation timeline.</b> The PHA will continue to assess current systems to determine whether rent reform activity would be beneficial and achievable.</p>	

<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.	0 # of unit months
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	0 # of unit months

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

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

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

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



## **Hardship Policy**

The Hardship Policy applies to the following MTW Activities:  
Payment Standards: 2.b.

Hardship Exemptions provide temporary relief to participating households experiencing significant or unexpected increases in rent burden. Each request will be reviewed and weighed against other local resources available to the family. The result of the review may consist in referral to other local resources, and/or an adjustment in the portion of the family's rent.

Households that experience a decrease in income that is not expected to be short term or nonsignificant, may request an interim to have rent adjusted at any time in between regular examinations. Households with expenses that would allow new deductions may also request an interim.

### Process for Agency Review and Determination

The Household:

- A hardship request must be made in writing, stating both the reason for the hardship and the expected duration. With the request, the Household is required to provide documentation of the decreased income or increased expenses. There is no limit to the number of times a household may request an interim under the hardship policy.

The Agency will take the following actions:

- Refer the tenant to Community Action Program or other assistance for immediate and/or short-term assistance.
- Suspend the rent beginning the next month after the request until the agency has determined if the request is warranted.
- The Housing Specialist assigned to the participant's program will determine whether a hardship exists within a reasonable time after the family request.

The standard for this hardship will be if the changes result in a higher rent burden of at least 5% for more than 1 month, if outside assistance is not available and the decrease is not due to seasonal hours. In the case of seasonal work, a temporary hardship waiver may be granted for 3-6 months. After that, an interim may be conducted and if needed, another hardship may be applied for.

A household that reports "0" income from any source, or reports "0" income from wages, salary, or business, may qualify for the hardship waiver. However, if the household gains income above "0" from any source, the household is required to report it within 14 days. At that time, another interim

will take place and rent will be recalculated and regular recertifications will resume (annually). According to the PHA HCV Admin Plan, 11-F, PHA Policy: If the family has reported zero income, the family has 180 days to find employment or income or participation in the program will be terminated.

If the request does not meet the hardship standard or if proof of hardship is not provided, the agency must resume rent and collect any retroactive rent, if applicable. If an exemption is denied, the resident has the right to a second review through the grievance PHA's grievance procedure.



**FY25 PHA Impact Analysis**

**Payment Standards-Fair Market Rent**

**1. Impact on the agency’s finances (e.g., how much will the activity cost, any change in the agency’s per family contribution)**

Payment standards for vouchers across all bedroom sizes will increase to 120% to provide greater housing choice for households on the waiting list in an extremely tight rental market. HAP expenses will increase, but PHA can manage the increase through increased utilization and Admin Fee reserves.

<b>Bedroom Size</b>	<b>2025 FMR</b>	<b>Percent Proposed</b>	<b>Payment Standard @ 120%</b>	<b>Increase from 2024 Payment Standard</b>
SRO	\$1,106.00	120%	\$1,328.00	\$106.00
0 Bedroom	\$1,106.00	120%	\$1,770.00	\$141.00
1 Bedroom	\$1,475.00	120%	\$1,820.00	\$80.00
2 Bedroom	\$1,961.00	120%	\$2,353.00	\$150.00
3 Bedroom	\$2,429.00	120%	\$2,915.00	\$102.00
4 Bedroom	\$2,749.00	120%	\$3,299.00	\$0.00
5 Bedroom	\$3,161.00	120%	\$3,793.00	-\$1.00

**2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)**

PHA’s analysis indicated a change for a minimal number of current voucher holders. Currently, 12% of PHA Voucher Holders pay more than 30% of their income for rent due to high rental costs. Setting the standards higher will lower the percentage down to, or closer to, the 30% “affordable” standard.

**3. Impact on the agency’s waitlist(s) (e.g., any change in the amount of time families are on the waitlist)**

Implementation of this activity should shorten the family’s time on the waiting list. The guideline for “affordable rent”, being less restricted, will open up more housing choices and less time may be needed to find a suitable unit. Based on a report sample from September 2023 – August 2024, 55% of vouchers issued leased up within the initial 60 days allowed. Some of those lease “in place” and do not have to search for a unit. Extensions are requested by 7% of issued voucher holders; of that 7%, 3% expire. Out of all issued vouchers, 5% expire. There is a high psychological cost for those searching for units that fit within the current payment standards and being rejected by landlords in higher opportunity areas.

- 4. Impact on the agency's termination rate of families) (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)**  
Fewer terminations are expected because rents will be more affordable. Landlords will have more incentive to keep HCV Holders if they can raise the rents without risking rent delinquencies due to income hardship.
- 5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program.** Fluctuations will still occur due to normal turnaround times of vouchers. PHA anticipates a higher utilization rate because of this activity.
- 6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice.** Increased payment standards will increase *housing choices* for low-income families by enabling them to move to higher opportunity areas. This is our primary goal of this activity. The activity will also increase *self-sufficiency*, as residents will be able to move to areas of higher opportunity with more access to community resources, job training, transportation, and employment. *Cost effectiveness* will also be increased as increased self-sufficiency will long-term result in decreased HAP payments and a decrease in administrative work as fewer tenants will need to move due to rent increases.
- 7. Impact on the agency's ability to meet the MTW statutory requirements**
  - 1) **Ensure 75% of households are very low-income.** No impact expected. Income requirements remain unchanged.
  - 2) **Establish a reasonable rent policy that encourages employment and self-sufficiency.** No impact expected. Policy remains the same.
  - 3) **Continue to assist substantially the same total number of eligible low-income households.** Utilization is expected to go up with the increased housing choices.
  - 4) **Continue to assist a comparable mix of households by family size.** This activity is not expected to affect the family sizes being served.
  - 5) **Meet Housing Quality Standards.** This activity is expected to have a positive impact on our ability to ensure housing assisted under the MTW Demonstration Program meets housing quality standards established as higher quality units will become available due to the higher payment standards.
- 8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity:** No impact is expected.
- 9. Across the other factors above, the impact on protected classes (and any associated disparate impact)** All voucher holders, including any protected classes are expected to benefit with this activity by opening up housing choices. Housing areas that may have not been affordable to households in the past, may be more obtainable financially.



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**MTW Supplement to the Annual Plan  
FY 2025  
Analysis of Feedback**

The plans were presented to a mixed audience, meaning each waiver or part of the PHA Plan did not apply to every person present. For example, the Resident Advisory Board has representation from residents living at our LIHTC properties, which the public housing waivers are not applicable for. Minutes from the Resident Advisory Board September meeting and the public hearing from the October 9 Portsmouth Housing Authority Board of Commissioners are both included in this MTW Supplement. There were no specific suggestions regarding modifying or adding waivers.



MINUTES  
**DRAFT**  
REGULAR MEETING  
BOARD OF COMMISSIONERS

PORTSMOUTH HOUSING AUTHORITY  
245 MIDDLE STREET, PORTSMOUTH, NH  
October 9, 2024 – 2:00 p.m.

Chair Ferrini called the meeting to order.

**I. ROLL CALL**

<b>PRESENT</b>	<b>LATE ARRIVAL</b>	<b>ABSENT</b>
Commissioner Bergeron		Commissioner Rodenhizer
Commissioner Griffin		
Commissioner Main		
Commissioner Pickering		
Chair Ferrini		

**Also present:** Executive Director Craig Welch, Finance Director Valerie Labrie, Outreach Director Andrea Pickett, Operations Manager Mary Bartlett

Chair Ferrini declared a quorum present.

**II. READING OF MEETING MINUTES**

**Commissioner Pickering motioned to waive the reading of the minutes dated September 11, 2024, and accept as presented. Commissioner Griffin seconded the motion.**

**The votes were as follows:**

<b>AYES</b>	<b>NAYS</b>	<b>ABSTENTIONS</b>
Commissioner Bergeron		
Commissioner Griffin		
Commissioner Main		
Commissioner Pickering		
Chair Ferrini		

**The motion passed.**

**III. PUBLIC COMMENTS**

There were no comments from the public.

**IV. COMMUNICATIONS & CORRESPONDENCE**

Mr. Welch presented an email correspondence from Matthew Gonyner, a Portfolio Specialist with the Department of Housing and Urban Development. Matthew commended the PHA for an excellent job increasing voucher utilization in 2024.

**V. EXECUTIVE DIRECTOR’S REPORT**

Mr. Welch summarized his report, including data on resident move-outs between September 2022-2024 and the great work the Resident Services team has been doing.

**VI. OLD BUSINESS**

**A. Sherburne School Below Market Rate Housing Development RFP Response**

Mr. Welch reported that the Request for Proposals deadline was postponed to Friday October 11 at 1pm. PHA staff will submit their proposal by that deadline.

**B. Christ Church Workforce Housing Development Update**

Mr. Welch reported that the State, including the Charitable Trust Division of the Attorney General’s office, have been cooperative in the PHA’s request for the waiver of

reversionary rights to the property by the Stone Trust. The waiver also needs to be approved by the Trustees of the Stone Trust at TD Bank, and PHA is awaiting their approval or additional questions.

**VII. NEW BUSINESS**

**A. Acceptance of the 2023 Financial Statements**

Ms. Labrie summarized the main points of the 2023 Financial Statements.

**Commissioner Main motioned to accept the 2023 Financial Statements, as presented. Commissioner Pickering seconded the motion.**

**The votes were as follows:**

<b>AYES</b>	<b>NAYS</b>	<b>ABSTENTIONS</b>
Commissioner Bergeron		
Commissioner Griffin		
Commissioner Main		
Commissioner Pickering		
Chair Ferrini		

**The motion passed.**

**B. Public Hearing for the PHA 5-Year Agency Plan**

Mr. Welch summarized the main points of the PHA 5-Year Agency Plan. He noted that this outlines goals, as outlined in our Strategic Plan, for the next five years.

**Commissioner Bergeron motioned to approve the PHA 5-Year Agency Plan for 2025-2029. Commissioner Pickering seconded the motion.**

**The votes were as follows:**

<b>AYES</b>	<b>NAYS</b>	<b>ABSTENTIONS</b>
Commissioner Bergeron		
Commissioner Griffin		
Commissioner Main		
Commissioner Pickering		
Chair Ferrini		

**The motion passed.**

**C. Public Hearing for the PHA 2025 Annual Plan**

Mr. Welch summarized the main points of the PHA 2025 Annual Plan. He noted that the plan includes items in our administrative plans that were updated in the last year, as well as a progress report on our goals from the most recent 5-Year Plan.

**Commissioner Griffin motioned to approve the PHA 2025 Annual Plan.**

**Commissioner Pickering seconded the motion.**

**The votes were as follows:**

<b>AYES</b>	<b>NAYS</b>	<b>ABSTENTIONS</b>
Commissioner Bergeron		
Commissioner Griffin		
Commissioner Main		
Commissioner Pickering		
Chair Ferrini		

**The motion passed.**

**D. Public Hearing for the PHA 2025 MTW Supplement to the Annual Plan**

Commissioner Main asked for an explanation of waivers 1.m. and 1.n. (Utility Reimbursements). Ms. Labrie explained that in many cases, the PHA is issuing checks for a very low amount (i.e. \$1.00) and some checks require voiding/reissuing due to tenants not cashing them. These waivers would allow the PHA to eliminate these utility reimbursement payments, which will increase revenue for the PHA while making households more self-reliant.

**Commissioner Pickering motioned to approve the 2025 MTW Supplement to the Annual Plan. Commissioner Bergeron seconded the motion.**

**The votes were as follows:**

<b>AYES</b>	<b>NAYS</b>	<b>ABSTENTIONS</b>
Commissioner Bergeron		
Commissioner Griffin		
Commissioner Main		
Commissioner Pickering		
Chair Ferrini		

**The motion passed.**

**VIII. OPERATIONAL REPORTS**

**Commissioner Bergeron motioned to approve the operational reports. Commissioner Griffin seconded the motion.**

**The votes were as follows:**

<b>AYES</b>	<b>NAYS</b>	<b>ABSTENTIONS</b>
Commissioner Bergeron		
Commissioner Griffin		
Commissioner Main		
Commissioner Pickering		
Chair Ferrini		

**The motion passed.**

**IX. COMMISSIONERS COMMENTS**

There was no discussion.

**X. ADJOURNMENT**

**Commissioner Pickering motioned to adjourn the meeting. Commissioner Main seconded the motion.**

There was no further discussion.

**The votes were as follows:**

<b>AYES</b>	<b>NAYS</b>	<b>ABSTENTIONS</b>
Commissioner Bergeron		
Commissioner Griffin		
Commissioner Main		
Commissioner Pickering		
Chair Ferrini		

**The motion passed, and the meeting adjourned.**

**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 (01/01/2025), 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 Housing Authority

NH004

**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).*

Thomas G. Ferrini

Chairperson, Portsmouth Housing Authority

**NAME OF AUTHORIZED OFFICIAL**

**TITLE**

  
\_\_\_\_\_  
**SIGNATURE**

10/9/24  
\_\_\_\_\_  
**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.*