

PHA Name : Robeson County

PHA Code : NC084

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

PHA Program Type: Public Housing (PH) only

MTW Cohort Number: MTW Flexibility for Smaller PHAs

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

INTRODUCTION

Robeson County Housing Authority (RCHA) is an approved Moving to Work (MTW) agency and as such has broad authority to propose regulatory waivers designed to incentivize family self-sufficiency, promote housing choice, and improve cost-effectiveness through regulatory simplification.

In 2023, the RCHA will continue the majority of the MTW activities proposed in its approved 2022 MTW Supplement. The following are modifications in the 2023 MTW Supplement: 1) The RCHA removed the Step Rent Waiver because the agency will implement Triennially Recertifications for all 290 households. 2) RCHA added the Utility Reimbursements waiver for public housing and 3) RCHA added the Family Self Sufficiency with MTW Flexibilities Waiver. The RCHA was awarded the Family Self-Sufficiency (FSS) grant on January 26, 2023. The agency wanted to implement flexibilities at the inception of the grant to avoid being regulated to establish a traditional MTW FSS program in the future.

MTW GOAL 1: REDUCE COST AND ACHIEVE GREATER COST-EFFECTIVENESS IN FEDERAL EXPENDITURES

1. Alternative Reexamination Schedule

RCHA will reduce the frequency of tenant reexaminations to Triennially for all families allowing one interim adjustment per year at the request of the household if the household's gross income has decreased by 10% or more.

Triennial Reexaminations are a potentially strong incentive to encourage increased work and earnings. It would allow more years to pass before families are required to have their eligibility for their "total tenant payment" (TTP) redetermined—a process commonly referred to as "recertification."

A change in the recertification timeframe from an annual recertification schedule to a longer recertification period means that no matter how much families earned during that period, none of the increased earnings would go toward higher contributions for rent and utilities (as would be true under traditional rules).

An extended recertification period could also reduce the administrative burden: Public Housing Authority (PHA) staff would spend less time conducting recertifications, and families would spend less time having to document and report their incomes to the PHA.

Robeson County will amend the Public Housing Admissions and Continued Occupancy Policy (ACOP) and gain board approval by June 30, 2023. The Triennial Reexaminations will begin with families that have annual recertification due in July 2023. Additional families will be phased in at the time of their annual recertification. RCHA will continue this process until all current and new families are phased in. This process will take approximately a year (July 1, 2023 -June 30, 2024) to implement.

2. Utility Reimbursements (PH)

This policy is newly added in 2023. Robeson County Housing Authority will eliminate utility reimbursement payments in the public housing program when the utility allowance is greater than the total tenant payment.

3. Stepped Rent- This policy was in the previous year supplement. In 2023 it will be discontinued due because the agency felt it will be difficult to step families up annually due to the implementation of the triennial reexamination schedule in 2023. To date, the stepped rent activity has not been implemented in Robeson County. Therefore, we anticipate no impact to RCHA families by discontinuing this activity.

MTW GOAL 2: GIVE INCENTIVES TO FAMILIES WITH CHILDREN WHERE THE HEAD OF HOUSEHOLD IS WORKING; IS SEEKING WORK; OR IS PREPARING FOR WORK BY PARTICIPATING IN JOB TRAINING, EDUCATIONAL PROGRAMS, OR PROGRAMS THAT ASSIST PEOPLE TO OBTAIN EMPLOYMENT AND BECOME ECONOMICALLY SELF-SUFFICIENT.

1. Family Self-Sufficiency Program with MTW Flexibility: Modify or Eliminate the Contract of Participation (PH)

The Robeson County Housing Authority will modify the terms of the FSS Contract of Participation (HUD-52650), in lieu of a local form. The RCHA will modify the terms of the Contract of Participation to align with adjustments made to its MTW FSS Program using MTW flexibility.

The RCHA will disburse a portion of the FSS escrow account funds before completion of the Contract of Participation (CoP) when the family has met certain interim goals, which means the family has met all its obligations under the CoP to date, including completion of the Individual Training and Service Plans (ITSP) interim goals and tasks to date, and: Requested funds are needed to complete an interim goal or task within the CoP and are not ongoing expenses.

The RCHA may also use unrestricted net position funding for reasonable and eligible FSS supportive services costs, in amounts approved by the Board of Commissioners in its annual budget process. The PHA may also use its funding flexibility as an MTW agency to utilize Capital Funds for these purposes.

2. MTW Self-Sufficiency Program: Alternative Family Selection Procedures (PH)

BRIDGE Program

RCHA will develop a MTW basic skill set program called BRIDGE for youth and adult residents. RCHA will use incentives to motivate children and teens to become interested in out-of-school time programs that they might not have been interested in initially. Using incentives can help attract and retain children and youth by promoting program attendance and making young people feel invested in programs.

Some programs that RCHA will implement with youth are Report Card Rewards, A Clean and Green Community Program, Summer Youth Work Program, Tool Time with Teens, Sports Participation Programs, and other programs deemed appropriate for youth development.

For adults, the program will include skills assessment/job readiness training; health assessment and services referrals; identified transportation needs, and child care needs; training in basic financial literacy and credit education; and ready-to-rent training. RCHA will make participation in the MTW Self-Sufficiency program mandatory for any household member that is non-working, non-elderly, or non-disabled.

RCHA will not use income increases during participation in the MTW program to change a family's eligibility status for purposes of participation in the MTW Self-Sufficiency Program or for the receipt of public housing or HCV assistance.

TIDY (Techniques to Improve & Discipline Yourself)

RCHA will Reduce Costs and Achieve Greater Cost-Effectiveness in Federal Expenditures by Streamlining unit inspections for Public Housing residents and offering an incentive for good housekeeping as a way to preserve the housing stock and reduce maintenance costs. In 2022 RCHA moved from conducting annual inspections to biannual inspections and in 2023 will implement the incentive program, a \$50.00 incentive for good housekeeping. We will also assist families with becoming more self-sufficient by implementing a program called TIDY. TIDY will teach residents techniques that will help them save money in the home instead of allotting funds to pay maintenance charges for damages and excess utilities. They will also receive tips on how to clean on a budget. The ultimate goal of TIDY is to teach residents how to take care of their homes so they will be self-sufficient once they transition out of public housing.

MTW GOAL 3: INCREASE HOUSING CHOICES FOR ELIGIBLE LOW-INCOME FAMILIES

1. Seek Non-Profit status and increase housing portfolio.

In the 2022 Supplement, RCHA used its flexibility to develop a nonprofit affiliate. In 2023, RCHA will continue to use its flexibility to support the administrative and functional costs of the nonprofit. The nonprofit affiliate will enable the Robeson County housing authority to act more like a private housing developer in addressing local needs, provide flexibility to acquire property on the private market, and give the agency the ability to attract more funding through its nonprofit 501 c3 status.

2. Acquisition without prior HUD approval.

RCHA will be authorized to acquire public housing sites without prior HUD approval. This activity allows flexibility around the timing of HUDs approval, but the not content of the approval. When acquiring the sites, the RCHA will have all submission materials in place as if HUD were approving the acquisition proposal prior to acquisition. The RCHA will provide the materials to the field office for approval within 30 days of acquisition.

3. Housing Development Program

RCHA will use MTW funding to acquire, renovate and/or build affordable units for low-income families that are not public housing units. Eligible activities may include gap financing for non-PHA development of affordable housing, development of project-based voucher units, or tax credit partnerships. The RCHA will incorporate predevelopment costs in its 5-year capital funds plans and utilize these funds for costs associated with the development of non-PHA affordable housing. The following are work items that require funding: site control, appraisals, market analysis, survey, subsurface soil analysis, environmental review, site, and utility engineering, schematic landscape planning, schematic architectural drawings, schematic permits and fees, legal, accounting, development management and feasibility consulting.

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

1. Tenant Rent Policies	
c. Stepped Rent (PH)	Will be Discontinued in the Submission Year
m. Utility Reimbursements (PH)	Plan to Implement in the Submission Year
2. Payment Standards and Rent Reasonableness	
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Plan to Implement in the Submission Year
4. Landlord Leasing Incentives	
5. Housing Quality Standards (HQS)	
6. Short-Term Assistance	
7. Term-Limited Assistance	
8. Increase Elderly Age (PH & HCV)	
9. Project-Based Voucher Program Flexibilities	
10. Family Self-Sufficiency Program with MTW Flexibility	
e.PH Policies for Addressing Increases in Family Income (PH)	Plan to Implement in the Submission Year
11. MTW Self-Sufficiency Program	
a.PH Alternative Family Selection Procedures (PH)	Plan to Implement in the Submission Year
12. Work Requirement	
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
14. Moving on Policy	
15. Acquisition without Prior HUD Approval (PH)	
Acquisition without Prior HUD Approval (PH)	Currently Implementing
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	
c. Housing Development Programs	Currently Implementing

C. MTW Activities Plan that Robeson County Plans to Implement in the Submission Year or Is Currently Implementing

1.c. - Stepped Rent (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
Discontinued
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 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.
Discontinued
Please provide an explanation as to why the activity was discontinued or will be discontinued.
Conflict with the FSS program

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.

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).

N/A

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

No document is attached.

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

Other\Not Applicable. [If checked]: Please explain

1.m. - Utility Reimbursements (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

Robeson County Housing Authority will eliminate Utility Reimbursements (UR) payments when the Utility allowance is greater than the TTP. This will reduce the time and cost associated with cutting checks and mailing them to utility companies. In the future, the RCHA plan to increase the minimum rent, therefore it would reduce the number of families that qualify for UR. This waiver will not result in the agency's per-family contribution increasing. However, it will result in about 50 family's paying more towards their housing costs because they will no longer receive the reimbursement check to offset those utility costs. There will be no impact on the waiting list. No impact on the termination rate of families. It will not affect the utilization rate. Moreover, it will meet the MTW goal of cost-effectiveness by the agency's longer spending time to issue UR checks. It will also meet the MTW goal of a reasonable rent policy that encourages employment and family self-sufficiency. Lastly, it will not affect protected classes.

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

Increased revenue; Decreased expenditures

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

The MTW activity applies to all assisted households

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

A new activity, not previously implemented

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

RCHA will reduce the frequency of tenant reexaminations to Triennially for all families allowing one interim adjustment per year at the request of the household if the household's gross income has decreased by 10% or more.

Triennial Reexaminations are a potentially strong incentive to encourage increased work and earnings. It would allow more years to pass before families are required to have their eligibility for their "total tenant payment" (TTP) redetermined—a process commonly referred to as "recertification."

A change in the recertification timeframe from an annual recertification schedule to a longer recertification period means that no matter how much families earned during that period, none of the increased earnings would go toward higher contributions for rent and utilities (as would be true under traditional rules).

An extended recertification period could also reduce the administrative burden: Public Housing Authority (PHA) staff would spend less time conducting recertifications, and families would spend less time having to document and report their incomes to the PHA.

Robeson County will amend the Public Housing Admissions and Continued Occupancy Policy (ACOP) and gain board approval by June 30, 2023. The Triennial Reexaminations will begin with families that have annual recertification due in July 2023. Additional families will be phased in at the time of their annual recertification. RCHA will continue this process until all current and new families are phased in. This process will take approximately a year (July 1, 2023 -June 30, 2024) to implement.

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.

In 2022, The Robeson County Housing Authority updated its Public Housing Admissions and Continued Occupancy Policy (ACOP) to include triennially recertification in the policy. A 45-day review period and a hearing were conducted for residents and the community. The RCHA board of commissioners approved the changes made to the ACOP. All residents received a notice regarding the policy change. Additionally, a plan for implementation has been created internally and staff has been trained. We received the MTW technology grant and are waiting for system improvements to be made so we can track the recertifications electronically. In the alternative, we will create a separate filing system until the system is up and running.

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?

No

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?

1

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

Households may request one interim recertification per year if they have a 10% or more decrease in total household income. Households at zero income will have an interim certification when new income begins, or after 3 months of zero income, an interim will be completed with income from the previous certification. For households experiencing a hardship beyond these parameters, RCHA will consider classifying it as a long-term hardship. The RCHA Hardship Policy allows the authority the flexibility to address unique, unforeseeable circumstances that may occur and to protect families in crisis. To be considered for a hardship exemption, the household must apply for all benefits for which it may be eligible. Zero-income households must report income changes when income begins. For households experiencing hardship beyond these parameters, RCHA will consider classifying it as a long-term hardship. If RCHA determines there is a long-term hardship the family will be exempt from the MTW activity until the hardship no longer exists.

10.e.PH - Policies for Addressing Increases in Family Income (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

Robeson County Housing Authority was awarded the Family Self Sufficiency (FSS) grant on January 26, 2023. Robeson County Housing Authority will implement a Family Self-Sufficiency Program with MTW Flexibility. Below are RCHA MTW policies which are outlined in the RCHA's FSS Action Plan:

- The PHA will use its funding flexibility as a Moving to Work (MTW) agency for cost associated with the operation of the FSS program in the amounts approved by the Board of Commissioners in its annual operation funds budget.
- The PHA may also use unrestricted net position funding for reasonable and eligible FSS supportive services costs, in amounts approved by the Board of Commissioners in its annual budget process. The PHA may also use its funding flexibility as an MTW agency to utilize Capital Funds for these purposes.
- The Contract of Participation (CoP) will have an initial term of 5 years, and for good cause in the discretion of Robeson County Housing, may be extended between 1 and 5 additional years.
- If the CoP is ended for any reason other than the participant's failure or refusal, without good cause, to comply with the terms of the CoP, then the CoP will be considered nullified rather than terminated, and the FSS escrow funds earned to that date will be distributed to the family.
- The PHA will implement a new method for calculating the FSS escrow credit amounts outlined in Table 1: "Summary of Awards" in RCHA's FSS Action Plan.
- Consistent with Robeson County Housing's approved FSS Action Plan, FSS escrow funds will be awarded based on specific accomplishments, rather than calculation of income and rent. This change will make the escrow account process more equitable, reducing the variability of escrow awards based on factors beyond the family's control, such as family income at the time they join FSS and differences in earning potential between families. The initial schedule of awards may be amended from time to time with approval of the Board of Commissioners.
- Consistent with the PHA's approved FSS Action Plan, interest earned in Robeson County Housing's combined bank account for FSS escrow funds will be retained for FSS program purposes, including supportive services for FSS participants and training for FSS staff.

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

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.

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.

New Goal. Plan to implement in the submission 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?

No

Does the MTW activity require an impact analysis?

Provided Already

How will the MTW agency treat increased earnings for families participating in the FSS Program with MTW flexibility?

To calculate the FSS credit, RCHA will accurately determine the family's baseline earned income and baseline monthly rent and compare those figures with the family's current earned income and current monthly rent. The FSS credit is the lesser of 30 percent of one-twelfth or 2.5 percent of the amount by which the family's current annual earned income exceeds the family's baseline annual earned income; or the increase in the family's monthly rent. The increase in the family's monthly rent is the lower of either the amount by which the family's current monthly rent exceeds the family's baseline monthly rent.

As described in the FSS credit calculations above, any increases in family earned income resulting in increases in family rent are deposited in the escrow account. For this reason, and because of the nature of the FSS account, any increase in the earned income of an FSS family during its participation in an FSS program may not be considered as income or an asset for purposes of eligibility of the FSS family for other benefits, or amount of benefits payable to the FSS family, under any other program administered by HUD.

Consistent with Robeson County Housing's approved FSS Action Plan, FSS escrow funds will be awarded based on specific accomplishments, rather than calculation of income and rent. This change will make the escrow account process more equitable, reducing the variability of escrow awards based on factors beyond the family's control, such as family income at the time they join FSS and differences in earning potential between families. The initial schedule of awards may be amended from time to time with approval of the Board of Commissioners.

11.a.PH - Alternative Family Selection Procedures (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

1. BRIDGE Program

RCHA will develop a MTW basic skill set program called BRIDGE for youth and adult residents. RCHA will use incentives to motivate children and teens to become interested in out-of-school time programs that they might not have been interested in initially. Using incentives can help attract and retain children and youth by promoting program attendance and making young people feel invested in programs. When identifying and using incentives, RCHA will consider the participants' ages, program needs, and potential supporters, and create a strategy to obtain support. Some programs that RCHA will implement with youth are Report Card Rewards, A Clean and Green Community Program, Summer Youth Work Program, Tool Time with Teens, Sports Participation Programs, and other programs deemed appropriate for youth development. For adults, the program will include skills assessment/job readiness training; health assessment and services referrals; identified transportation needs, and child care needs; training in basic financial literacy and credit

education; and ready-to-rent training. RCHA will make participation in the MTW Self-Sufficiency program mandatory for any household member that is non-working, non-elderly, or non-disabled.

RCHA will not use income increases during participation in the MTW program to change a family's eligibility status for purposes of participation in the MTW Self-Sufficiency Program or for the receipt of public housing or HCV assistance.

2. TIDY (Techniques to Improve & Discipline Yourself)

RCHA will Reduce Costs and Achieve Greater Cost-Effectiveness in Federal Expenditures by Streamlining unit inspections for Public Housing residents and offering an incentive for good housekeeping as a way to preserve the housing stock and reduce maintenance costs. In 2022 RCHA moved from conducting annual inspections to biannual inspections and in 2023 will implement the incentive program, a \$50.00 incentive for good housekeeping. We will also assist families with becoming more self-sufficient by implementing a program called T.I.D.Y (Techniques to Improve & Discipline Yourself). TIDY will teach residents techniques that will help them save money in the home instead of allotting funds to pay maintenance charges for damages and excess utilities. They will also receive tips on how to clean on a budget. The ultimate goal of TIDY is to teach residents how to take care of their homes so they will be self-sufficient once they transition out of public housing.

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

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 revenue; 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 to all assisted households

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

In 2022, RCHA moved from conducting annual inspections to biannual inspections and in 2023 will implement the incentive program for good housekeeping. Qualifying tenants will receive up to \$50.00 annually for good house keeping. Additionally, RCHA implemented the TIDY (Techniques to Improve and Discipline Yourself) program with residents that failed their initial inspections. The following data shows that 27 individuals that failed their initial inspections and attended the TIDY class In 2023, passed their second inspection. RCHA in partnership with Robeson Community College conducted a series of workforce development trainings. There was a total of 9 individuals that completed the course. In 2022, RCHA did not make it mandatory for participation. However, in 2023 it will be mandatory for any household member that is non-working, non-elderly, or non-disabled. RCHA also implemented Report Rewards for youth residents. This program offers incentives for youth that made the A or A/B honor roll per report card period. The program was initiated in January 2023.

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?

No

Does the MTW activity require an impact analysis?

Provided Already

Will the MTW agency's MTW Self-Sufficiency policy make the program mandatory for anyone?

Yes

Please describe the population group for whom participation in the MTW Self-Sufficiency program is mandatory.

The MTW Self-Sufficiency Program will be mandatory for any household member that is non-elderly or non-disabled. However, any supportive services provided in the Program will be offered to elderly and disabled household members that qualify for such services.

15. - Acquisition without Prior HUD Approval (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

RCHA will be authorized to acquire public housing sites without prior HUD approval. This activity allows flexibility around the timing of HUDs approval, but the not content of the approval. When acquiring the sites, the RCHA will have all submission materials in place as if HUD were approving the acquisition proposal prior to acquisition. The RCHA will provide the materials to the field office for approval within 30 days of acquisition.

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 revenue

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.

Robeson County Housing Authority is currently in the process of purchasing 8 acres of land to use for the first supportive housing development project in Robeson County targeting youth aging out of foster care. This project will potentially be funded by the North Carolina Housing Finance Agency.

RCHA will seek to purchase a house to use a training center for families. The house will be named "Our house". It will provide training on cooking, general house keeping, home ownership and etc. It will be done in a home setting to motivate families to to be become homeowners. When the house is not in use, it can be rented to the community. The profits will be generated back to the residents and used to increase affordable housing in Robeson county.

We will also seek to purchase older buildings or hotels to use as emergency housing in Robeson County.

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

No

17.c. - Housing Development Programs

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

1. Seek Non-Profit status and increase housing portfolio.

In the 2022 Supplement, RCHA used its flexibility to develop a nonprofit affiliate. In 2023, RCHA will continue to use its flexibility to support the administrative and functional costs of the nonprofit. The nonprofit affiliate will enable the Robeson County housing authority to act more like a private housing developer in addressing local needs, provide flexibility to acquire property on the private market and give the agency the ability to attract more funding through its nonprofit 501 c3 status.

2. Housing Development Program

RCHA will use MTW funding to acquire, renovate and/or build affordable units for low-income families that are not public housing units. Eligible activities may include gap financing for non-PHA development of affordable housing, development

of project-based voucher units, or tax credit partnerships. The RCHA will incorporate predevelopment costs in its 5-year capital funds plans and utilize these funds for costs associated with the development of non-PHA affordable housing. The following are work items that require funding: site control, appraisals, market analysis, survey, subsurface soil analysis, environmental review, site, and utility engineering, schematic landscape planning, schematic architectural drawings, schematic permits and fees, legal, accounting, development management and feasibility consulting

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 revenue; Decreased expenditures

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

The MTW activity applies to all assisted households

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

In the 2022 Supplement, RCHA used its flexibility to develop a nonprofit affiliate, Robeson Development Corporation.

Also, Robeson County Housing Authority used its flexibility in funding to assist with the payment of pre-development costs for land that we are acquiring for a supportive housing development project targeting youth aging out of foster care.

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
Caton Cove	New Construction	Gap Financing	15.00	15.00	15.00	0.00	0.00	0.00
Westgate Terrace	Rehabilitation	Gap Financing	100.00	100.00	100.00	0.00	0.00	0.00
The Stream	New Construction	Gap Financing	10.00	10.00	10.00	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
Caton Cove	New Construction	Gap Financing	15.00	15.00	15.00	0.00	0.00	0.00

Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year

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

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

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

E.2	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>Does the MTW agency have any approved Agency-Specific Waivers? No</p>

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2022	\$1,115,617	\$277,265	\$204,411	2023-06-30

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

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

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

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

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

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

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

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

I.	Evaluations.
	No known evaluations.

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (07/01/2023), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

Robeson County Housing Authority

NC084

MTW PHA NAME

MTW PHA NUMBER/HA CODE

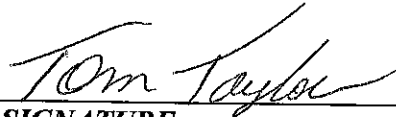
I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Tom Taylor

Board of Commissioners Chairman

NAME OF AUTHORIZED OFFICIAL

TITLE



05/09/2023

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.*



IMPACT ANALYSIS

Activity

Discontinued in 2023

1.c Stepped Rent (PH) RCHA will create a stepped rent model by unit size that increases the family's rent payment on a fixed schedule (Annually-July 1st) in both frequency (once per year) and amount (4% FMR).

Rationale

The RCHA will eliminate the Stepped Rent activity from its MTW supplement in 2023 because the agency felt it will be difficult to step families up annually due to the implementation of the triennial reexamination schedule in 2023. Instead, RCHA proposes to implement the utility reimbursement (UR) policy which will eliminate UR payments when the utility allowance is greater than the TTP.

Impact

To date, the stepped rent activity has not been implemented in Robeson County. Therefore, we anticipate no impact to RCHA families by discontinuing this activity.



IMPACT ANALYSIS

Activity	11.a MTW Self-Sufficiency Program- Alternative Family Selection Procedures (PH)- Mandatory for eligible families
1. Describe the activity's impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)	
We anticipate some increase in expenses due to offering incentives for participation. Supportive programs will be in-kind, which will be provided by community partners. Programs costs will be offset through improved self-sufficiency which could lead to the tenant's ability to cover their rent.	
2. Describe the activity's impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs).	
We anticipate significant benefits to families as well as increased housing choice and self-sufficiency. The Self-Sufficiency program will encourage full- and part-time employment options.	
3. Describe the impact on the agency's waitlist(s) (e.g., any change in the amount of time families is on the waitlist).	
None expected. Families may achieve self-sufficiency more quickly than in the past, opening units and reducing wait times.	
4. Describe the impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency).	
No major change expected. A possible increase in termination rate may occur due to the program being mandatory for eligible families. However, our goal is to retain families through supportive programs and our hardship policy.	
5. Describe the impact on the agency's current occupancy level in public housing and utilization rate in the HCV program.	
None expected	
6. Describe the impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice.	
We anticipate the activity will provide a positive impact on achieving MTW goals through cost savings in improved self-sufficiency and housing choice for households. This activity will improve self-sufficiency and housing choice by providing households with the skills and support for employment which could lead to the tenant's ability to cover their rent and/or save for a rental deposit or homebuyer down payment.	
7. Describe the impact on the agency's ability to meet the MTW statutory requirements.	
We anticipate that this activity will have the most significant impact on households in assisting them in becoming more self-sufficient. The collection of more tenant rents will improve overall program cost effectiveness.	
8. Describe the impact on the rate of hardship requests and the number granted and denied as a result of this activity.	

We anticipate a slight increase in hardship requests and the number granted and denied due to the program being mandatory for qualifying families.

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

None expected because the program will not be mandatory for elderly and disabled families and individuals that do not meet the definition of an eligible family at section 23 (n)(3) of the US housing Act of 1937 and those exempted from the community service requirement under section 12 (c) (2)(A), (B), (D) and (E) of the 1937 Act



IMPACT ANALYSIS

Housing Authority Activity	3.a Alternative Reexamination Schedule for Households (PH)
1. Describe the activity's impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution).	
<p>We anticipate some increase in expenses due to annual/inflationary rent increases and no corresponding tenant rent share increases. Process costs will be offset by staff and administrative cost savings.</p>	
2. Describe the activity's impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs).	
<p>We anticipate significant benefit to families as well as increased housing choice and self-sufficiency. The biennial/triennial certification process will allow households to retain additional earnings and encourage full- and part-time employment options.</p>	
3. Describe the impact on the agency's waitlist(s) (e.g., any change in the amount of time families is on the waitlist).	
<p>None expected. Families keeping more of their earned income may achieve self-sufficiency more quickly than in the past, opening units and reducing wait times.</p>	
4. Describe the impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency).	
<p>No change expected. Possible reduction in termination rate with recertification less often and household keeping income increases for that time.</p>	
5. Describe the impact on the agency's current occupancy level in public housing and utilization rate in the HCV program.	
<p>None expected</p>	
6. Describe the impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice.	
<p>We anticipate the activity will provide a positive impact on achieving MTW goals through cost savings in staff time as well as improved self-sufficiency and housing choice for households. Staff will reallocate the time previously spent on certification to assist in stabilization activities. This activity will improve self-sufficiency and housing choice by allowing households to keep more income between certifications leading to the ability to cover rent or save for a rental deposit or homebuyer down payment.</p>	
7. Describe the impact on the agency's ability to meet the MTW statutory requirements.	
<p>We anticipate that this activity will have the most significant impact on households in assisting them in becoming more self-sufficient. The staff time saved through less frequent certification improves overall program cost effectiveness.</p>	
8. Describe the impact on the rate of hardship requests and the number granted and denied as a result of this activity.	
<p>None expected. This change should be an advantage for all households, and households can request an interim certification annually.</p>	

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

None anticipated, should be a positive change for households within the protected classes



IMPACT ANALYSIS

Activity	10. Family Self-Sufficiency Program with MTW Flexibility: 10.d. Modify or Eliminate the Contract of Participation (PH)
1. Describe the activity's impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)	
<p>We anticipate some increase in expenses due to offering incentives for participation. Supportive programs will be in-kind, which will be provided by community partners. Programs costs will be offset through improved self-sufficiency which could lead to the tenant's ability to cover their rent.</p>	
2. Describe the activity's impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs).	
<p>We anticipate significant benefits to families as well as increased housing choice and self-sufficiency. The Self-Sufficiency program will encourage full- and part-time employment options.</p>	
3. Describe the impact on the agency's waitlist(s) (e.g., any change in the amount of time families is on the waitlist).	
<p>None expected. Families may achieve self-sufficiency more quickly than in the past, opening units and reducing wait times.</p>	
4. Describe the impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency).	
<p>No major change expected. A possible increase in termination rate may occur due to the program being mandatory for eligible families. However, our goal is to retain families through supportive programs and our hardship policy.</p>	
5. Describe the impact on the agency's current occupancy level in public housing and utilization rate in the HCV program.	
<p>None expected</p>	
6. Describe the impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice.	
<p>We anticipate the activity will provide a positive impact on achieving MTW goals through cost savings in improved self-sufficiency and housing choice for households. This activity will improve self-sufficiency and housing choice by providing households with the skills and support for employment which could lead to the tenant's ability to cover their rent and/or save for a rental deposit or homebuyer down payment.</p>	
7. Describe the impact on the agency's ability to meet the MTW statutory requirements.	
<p>We anticipate that this activity will have the most significant impact on households in assisting them in becoming more self-sufficient. The collection of more tenant rents will improve overall program cost effectiveness.</p>	
8. Describe the impact on the rate of hardship requests and the number granted and denied as a result of this activity.	

We anticipate a slight increase in hardship requests and the number granted and denied due to the program being mandatory for qualifying families.

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

None expected because the program will not be mandatory for elderly and disabled families and individuals that do not meet the definition of an eligible family at section 23 (n)(3) of the US housing Act of 1937 and those exempted from the community service requirement under section 12 (c) (2)(A), (B), (D) and (E) of the 1937 Act



Agency Analysis

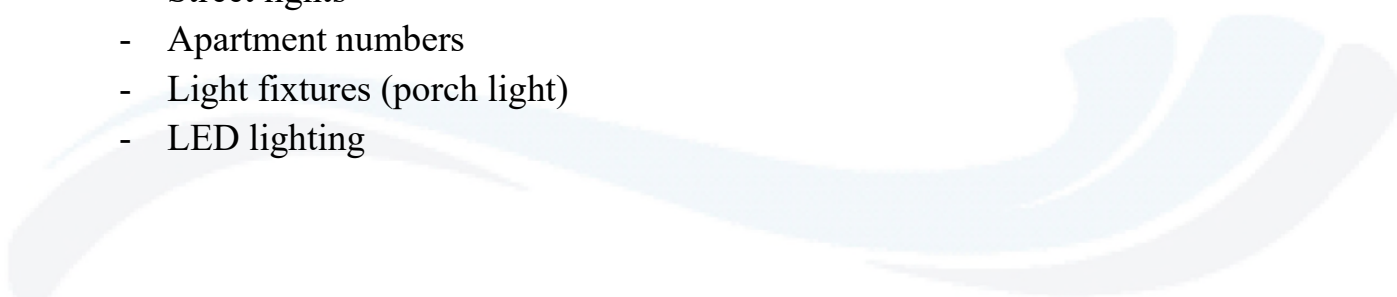
Based upon data from the Hearings conducted it was determined that the residents viewed the waivers selected by Robeson County Housing Authority as a benefit to their families. The residents indicated that the activities will help move families towards self-sufficiency, be cost effective for both parties and increase housing choices in Robeson County.

Focus Group Minutes 1/24/2023

1. MTW Goals

- Moving to a 3-year reexamination schedule.
- TIDY (tenants are only allowed to participate in the program once in a lifetime.)
- Stepped rent
- Report Card incentive for youth
- . Utility Reimbursements
- Housing Development for the following
 - o Youth aging out of foster care
 - o Vets
 - o Adults with disabilities
 - o Senior citizen
- Tenants like the MTW goals especially the 3-year reexamination schedule
- Tenants felt that eliminating the utility reimbursement payments in the public housing program encourage those with no income to work
- Tenants felt rewarding the children and doing more activities will help keep them out of trouble in the neighborhood
- Feedback on all MTW goals was positive tenants think that RCHA was going great things

Other topics of discussion

2. Tenants would like the building to be open in extreme weather conditions.
 3. Phone message may be too long.
 4. Magnets with office extensions on them may be more productive for tenants.
 5. Madison + Housing to hold training on the online workorder system.
6. Rehab Projects
- Street lights
 - Apartment numbers
 - Light fixtures (porch light)
 - LED lighting
- 



7. Tenants would rather have dryers than clothing lines.

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Lumberton, NC 28360

RobesonHA.org  





MTW HARDSHIP POLICY

This hardship policy applies to the following MTW activities:

- 1) Alternative Reexamination Schedule: Biennial & Triennial Certification and Interim Requests.
- 2) Stepped Rent; and
- 3) MTW Self-Sufficiency Program: Alternative Family Selection Procedures

I. DEFINITION OF HARDSHIP TYPES

a. A HARDSHIP EXISTS WHEN:

The family has lost eligibility for or is awaiting an eligibility determination for a federal, state, local assistance program; The family would be evicted as a result of the imposition of MTW activities; The family has experienced a decrease in income because of changed circumstances, including loss or reduction of employment, death in the family, or reduction in or loss of earnings or other assistance; The family has an increase in expenses because of changed circumstances, such as for medical costs, childcare, transportation, education, or similar items; and Such other situations and factors determined by the agency to be appropriate.

b. NO HARDSHIP EXISTS WHEN:

RCHA determines there is no qualifying hardship MTW activities will be reinstated, including requiring back payment of minimum rent and other costs or fees to RCHA for the time of suspension.

c. TEMPORARY HARDSHIP EXISTS WHEN:

RCHA determines that there is a qualifying hardship but that it is of a temporary nature. The MTW activity will not be imposed for a period of 90 days from the date of the family's Request. At the end of the 90-day period, the MTW activity will be imposed retroactively to the time of suspension. RCHA will offer a reasonable repayment agreement for any minimum rent back payment and any other costs and fees paid by RCHA on the family's behalf during the period of suspension.

d. LONG-TERM HARDSHIP EXISTS WHEN:

RCHA determines there is a long-term hardship the family will be exempt from the MTW activity until the hardship no longer exists.

II. HARDSHIP POLICY OVERVIEW

The RCHA Hardship Policy allows the authority the flexibility to address unique, unforeseeable circumstances that may occur and to protect families in crisis. To be considered for a hardship exemption, the household must apply for all benefits for which it may be eligible. Zero income households must report income changes when

income begins. Until income is restored to the household, households must continue to meet the definitions of hardship types above and also meet all of the following criteria:

- Remain in compliance with all program requirements
- Not owe RCHA any money or be current with a re-payment agreement
- Continued lack of income has not been through the fault of the household
- Have applied for financial resources it may be eligible for but been unsuccessful in securing those
- Request the hardship waiver within the deadline set by RCHA. Households have 10 business days from the date of their “Notice of Change” letter in which to request an Informal Hearing
- Have not received hardship relief for the same MTW activity previously

a. Triennial Certification and Interim Requests – New recertification schedule will be once every three years for residents. Households may request one interim recertification per year if they have a 10% or more decrease in total household income. Households at zero income will have an interim certification when new income begins, or after 3 months of zero income an interim will be completed with income from previous certification. For households experiencing a hardship beyond these parameters, RCHA will consider classifying it as a long-term hardship according to the policies and guidelines above.

b. Stepped Rent- Stepped Rent

- Initial Rent: Each household will start out paying rent equal to 30% of their total annual gross income in the prior year, or a minimum rent of \$50 (whichever is larger)
- Annual Stepped Rent Increase: RCHA will establish an annual stepped rent increase by unit size. After year 1, each household’s rent will increase by 4% of the FMR (with exceptions for hardships and triennial income reexaminations).
- Triennial Income Reexaminations: At the triennial income reexamination, the PHA will document household income and any changes in household composition. However, the triennial income reexamination will not affect the household’s rent.
- Hardship rents: A household will receive a hardship if their rent burden exceeds 40% of their current/anticipated total annual gross income or for other circumstances as determined by the PHA. The hardship rent will equal 30% of the household’s current/anticipated total annual gross income. The hardship rent will last for 1 to 12 months (at the PHA’s discretion) and can be renewed as needed.

c. MTW Self-Sufficiency Program: Alternative Family Selection Procedures- RCHA will develop an MTW basic skill set program for self -sufficiency including skills

assessment/job readiness training; health assessment and services referrals; identified transportation needs, child care needs; training in basic financial literacy and credit education; and ready read-to-rent training. RCHA will make participation in the MTW Self-Sufficiency program mandatory for any household member that is non-elderly or non-disabled. For households experiencing a hardship, RCHA will consider classifying it as a hardship according to the policies and guidelines above.

- d. **Family Self-Sufficiency Program with MTW Flexibility: Modify or Eliminate the Contract of Participation (PH)** -Robeson County Housing Authority was awarded the Family Self Sufficiency (FSS) grant on January 26, 2023. Robeson County Housing Authority will implement a Family Self-Sufficiency Program with MTW Flexibility. For households experiencing a hardship, RCHA will consider classifying it as a hardship according to the policies and guidelines outlined in the FSS Action Plan.

III. REQUESTING A HARDSHIP EXCEPTION

The family must formally request a hardship exception by submitting a completed Request for Hardship Exception in written form to RCHA. Forms are available upon request at RCHA's administrative office.

If a family requests a hardship exemption, RCHA will suspend the MTW activity beginning the month following the family's hardship request. The suspension will continue until RCHA can determine whether hardship exists and whether the hardship is of a temporary or long-term nature. During suspension, the family will not be required to participate in relevant MTW activities and support will be adjusted accordingly.

Determination will be made as soon as possible but will not take longer than 10 business days. If the request does not meet the hardship standards, MTW activities must resume and RCHA will collect any retroactive rent and other fees, if applicable, through a reasonable repayment agreement.

If the request does meet the hardship standards, RCHA will continue to provide an exemption from the MTW activity at a reasonable level and duration in accordance with its MTW policies.

APPEALS

Families who disagree with the hardship review decision may appeal the determination through RCHA's existing grievance process.

NOTIFICATION OF RESIDENTS

RCHA will:

Notify residents of its hardship policy at intake;

Review its hardship policy with residents at recertification; and

Consider if a resident qualifies for a hardship exemption when assistance is to be terminated due

to an MTW activity.

REQUIRED RECORD KEEPING

RCHA will preserve all records of hardship requests, determinations, and appeals for the duration of its MTW participation. RCHA will maintain records to ensure traceability of activities and comply with all applicable regulations. When compliant and reasonable, documentation will be maintained in electronic format. Records will be available for public review and inspection at the agency's administration office during normal business hours and supplied to HUD if requested.