

**PHA Name :** Robeson County

**PHA Code :** NC084

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

**PHA Program Type:** Public Housing (PH) only

**MTW Cohort Number:** 1

**MTW Supplement Submission Type:** Annual Submission

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

### **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.

#### **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 offer an incentive for good housekeeping as a way to preserve the housing stock and reduce maintenance costs. RCHA will move from conducting annual inspections to biannual inspections and offer 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.

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. Stepped Rent**

RCHA will implement a Stepped Rent Model that will increase the family's rent payment on a fixed schedule in both frequency and amount. The fixed schedule/ stepped rent model will be broken up into steps that will be derived from the family's income.

**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 (July 1) by unit size. After year 1, each household's rent will increase by RCHA established amount (with exceptions for hardships and triennial income reexaminations).

The Stepped Rent policy will increase tenants' rent annually by an amount unrelated to each household's income. The annual stepped rent increase will be a specific dollar amount, by unit size. It will be established by RCHA and can be set anywhere between 2% and 4% of the Fair Market Rent. Robeson County Housing Authority has chosen to use 4% of the Fair Market Rent. RCHA will exclude elderly and disabled families from the rent policy, will conduct annual impact analysis, and have a hardship policy in place.

#### **2. BRIDGE: A MTW Self-Sufficiency Program**

RCHA will develop an MTW basic skill set program called BRIDGE. The program will include 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-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.

### **MTW Goal 3: Increase Housing Choices for Eligible Low-Income Families**

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

RCHA is will develop a nonprofit affiliate. The nonprofit 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. There is a need for more affordable housing in Robeson County. (We currently have 1053 individuals on our waiting list). In 1996 the government eliminated the public housing development fund, which was the main vehicle for PHA development. Currently, housing authorities' main vehicle to increase the supply of affordable units is through the establishment of a nonprofit affiliate. Locally we would like to increase our supply of housing and establishing a nonprofit at RCHA will be our first step towards this goal.

#### **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. If the RCHA is unable to approve the acquisition based on the materials submitted, then the RCHA will repay the cost of acquisition with non-federal funds.

### 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. RCHA Will utilizes capital project funds for predevelopment costs associated with the development of non-PHA affordable housing. RCHA will need an estimated \$57,000 for predevelopment costs. 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.

Note: Work items and reasonable estimates of preliminary costs listed above are those required to obtain project financing commitments. Full development budgets cannot be compiled without first purchasing the early professional input contemplated in this listing. While the above costs can be rolled into project financing when secured, they must be initially funded by the ownership entity at risk. This can be accomplished through initial capitalization and predevelopment loans.

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

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

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| <b>1.c. - Stepped Rent (PH)</b>   |
| <p>RCHA will implement a Stepped Rent Model that will increase the family's rent payment on a fixed schedule in both frequency and amount. The fixed schedule/ stepped rent model will be broken up into steps that will be derived from the family's income.</p> <p>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).</p> <p>Annual Stepped Rent Increase: RCHA will establish an annual stepped rent increase (July 1) by unit size. After year 1, each household's rent will increase by RCHA established amount (with exceptions for hardships and triennial income reexaminations).</p> <p>The Stepped Rent policy will increase tenants' rent annually by an amount unrelated to each household's income. The annual stepped rent increase will be a specific dollar amount, by unit size. It will be established by RCHA and can be set anywhere between 2% and 4% of the Fair Market Rent.</p> <p>Robeson County Housing Authority has chosen to use 4% of the Fair Market Rent.</p> <p>RCHA will exclude elderly and disabled families from the rent policy, will conduct annual impact analysis, and have a hardship policy in place.</p> <p>This MTW activity serves the following statutory objectives:<br/> Cost effectiveness<br/> Self-sufficiency</p> <p>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households</p> <p>New Activity, not implemented in the previous year.</p> |

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| This MTW activity requires a Hardship Policy. The Hardship Policy is attached.   |
| Attached Hardship policy applies to: 1.c. - Stepped Rent (PH)<br>3.a. - Alternative Reexamination Schedule for Households (PH)}  |
| No hardship were requested in the most recent fiscal year.   |
| In the prior year, under this activity, Robeson County MTW agency<br>Received 0 hardship requests<br>Approved hardship requests<br>Denied hardship requests<br>There is\are hardship requests pending.   |
| This MTW activity requires an Impact Analysis. The Impact Analysis is attached.  |
| The Impact Analysis that applies to this MTW activity also applies to the following MTW activities:<br>1.c. - Stepped Rent (PH)<br>3.a. - Alternative Reexamination Schedule for Households (PH)   |
| 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).<br><br>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 RCHA established amount (with exceptions for hardships and triennial income reexaminations). The Stepped Rent policy will increase tenants rent annually by an amount unrelated to each household's income. The annual stepped rent increase will be a specific dollar amount, by unit size. It will be established by RCHA and can be set at 4% of the Fair Market Rent. Robeson County Housing Authority has chosen to use 4% of the Fair Market Rent.<br><br>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.<br>Please see the attached stepped rent schedule. |
| If a household progresses all the way through the stepped rent schedule,<br>They will no longer receive a subsidy  |

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| <b>3.a. - Alternative Reexamination Schedule for Households (PH)</b>   |
| 1. Alternative Reexamination Schedule<br>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 households gross income has decreased by 10% or more. |
| This MTW activity serves the following statutory objectives:<br>Cost effectiveness<br>Self-sufficiency   |
| An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households  |
| New activity, not previously implmented.   |
| This MTW activity requires a Hardship Policy. The Hardship Policy is attached.   |
| Attached Hardship policy applies to: 1.c. - Stepped Rent (PH)<br>3.a. - Alternative Reexamination Schedule for Households (PH)}  |
| No hardship were requested in the most recent fiscal year.   |
| In the prior year, under this activity, Robeson County MTW agency<br>Received 0 hardship requests<br>Approved hardship requests<br>Denied hardship requests<br>There is\are hardship requests pending.   |
| This MTW activity requires an Impact Analysis. The Impact Analysis is attached.  |
| The Impact Analysis that applies to this MTW activity also applies to the following MTW activities:<br>1.c. - Stepped Rent (PH)<br>3.a. - Alternative Reexamination Schedule for Households (PH)   |
| Recertification Schedule is Once every three years   |

Household may request 1 interim recertifications per year.

a. 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 a 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.

#### **11.a.PH - Alternative Family Selection Procedures (PH)**

BRIDGE: A MTW Self-Sufficiency Program

RCHA will develop an MTW basic skill set program called BRIDGE. The program will include 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-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.

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

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

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

A new activity, not previously implemented

No hardship were requested in the most recent fiscal year.

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

MTW Self-Sufficiency policy is mandatory for the following  
The MTW Self-Sufficiency program will be mandatory for all residents participating in the Stepped Rent Program & nonworking families that are not elderly or disabled. The agency will not do make MTW Self-Sufficiency program participation mandatory for 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.

#### **15. - Acquisition without Prior HUD Approval (PH)**

Seek Non-Profit status and increase the agency's housing portfolio.

RCHA is will develop a nonprofit affiliate. The nonprofit 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.

There is a need for more affordable housing in Robeson County. (We currently have 1053 individuals on our waiting list). In 1996 the government eliminated the public housing development fund, which was the main vehicle for PHA development.

Currently, housing authorities' main vehicle to increase the supply of affordable units is through the establishment of a nonprofit affiliate. Locally we would like to increase our supply of housing and establishing a nonprofit at RCHA will be our first step towards this goal.

This MTW activity serves the following statutory objectives:  
Housing choice

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

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

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| currently assisted households. The MTW activity applies to all assisted households   |
| A new activity, not previously implemented.  |
| No hardship were requested in the most recent fiscal year.   |
| In the prior year, under this activity, Robeson County MTW agency<br>Received 0 hardship requests<br>Approved hardship requests<br>Denied hardship requests<br>There is\are hardship requests pending. |

| <b>17.c. - Housing Development Programs</b>  |
|--|
| 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. RCHA Will utilizes capital project funds for predevelopment costs associated with the development of non-PHA affordable housing. RCHA will need an estimated \$57,000 for predevelopment costs. 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. |
| Note: Work items and reasonable estimates of preliminary costs listed above are those required to obtain project financing commitments. Full development budgets cannot be compiled without first purchasing the early professional input contemplated in this listing. While the above costs can be rolled into project financing when secured, they must be initially funded by the ownership entity at risk. This can be accomplished through initial capitalization and predevelopment loans.  |
| This MTW activity serves the following statutory objectives:<br>Housing choice   |
| This MTW activity serves the following statutory objectives:<br>Increased revenue<br>Increased expenditures  |
| An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households  |
| A new activity, not previously implemented.  |
| No hardship were requested in the most recent fiscal year.   |
| In the prior year, under this activity, Robeson County MTW agency<br>Received 0 hardship requests<br>Approved hardship requests<br>Denied hardship requests<br>There is\are hardship requests pending.   |

**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 |
|---------------------------------|--|--|----------------------------|-----------------------|---|---|---|--|
| The Stream                      | New Construction   | Gap Financing for Supportive Housing. RCHA will use mixed financing for the project. | 12.00                      | 12.00                 | 0.00  | 0.00  | 12.00   | 0.00                                     |
| The Stream                      | New Construction   | Gap Financing for Supportive Housing. RCHA will use mixed financing for the project. | 12.00                      | 12.00                 | 0.00  | 0.00  | 12.00   | 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 |
|---------------------------------|--|--|----------------------------|-----------------------|---|---|---|--|
|                                 |  |  | 0.00                       | 0.00                  | 0.00  | 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 |
|---------------------------------|--|--|----------------------------|-----------------------|---|---|---|--|
|---------------------------------|--|--|----------------------------|-----------------------|---|---|---|--|

**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 |
|---------------------------------|--|--|----------------------------|-----------------------|---|---|---|--|
|---------------------------------|--|--|----------------------------|-----------------------|---|---|---|--|



|            |   |
|------------|---|
| <b>D.</b>  | <b>Safe Harbor Waivers.</b>   |
| <b>D.1</b> | <b>Safe Harbor Waivers seeking HUD Approval:</b><br>No Safe Harbor Waivers are being requested. |

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

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

| <b>Federal Fiscal Year (FFY)</b> | <b>Total Operating Subsidy Authorized Amount</b> | <b>How Much PHA Disbursed by the 9/30 Reporting Period</b> | <b>Remaining Not Yet Disbursed</b> | <b>Deadline</b> |
|----------------------------------|--|--|------------------------------------|-----------------|
| 2021                             | \$1,141,473                                      | \$423,955  | \$717,518                          | 2022-06-30      |

| <b>G.</b>                                      | <b>MTW Statutory Requirements.</b>   |
|--|--|
| <b>G.1</b>                                     | <p><b>75% Very Low Income – Local, Non-Traditional.</b></p> <p>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.</p> |
| <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                     | 290  |
| Below 30% Area Median Income                   |  |
| <b>Total Local, Non-Traditional Households</b> | <b>290</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>MTW agency did not established a rent reform policy to encourage employment and self-sufficiency</p> <p>No</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:**

| <b>PROPERTY NAME/ ADDRESS</b> | <b>0/1 BR</b> | <b>2 BR</b> | <b>3 BR</b> | <b>4 BR</b> | <b>5 BR</b> | <b>6+ BR</b> | <b>TOTAL UNITS</b> | <b>POPULATION TYPE*</b> | <b>if 'Population Type' is Other</b> | <b># of Section 504 Accessible (Mobility)**</b> | <b># of Section 504 Accessible (Hearing/ Vision)</b> | <b>Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?</b> | <b>What was the Total Amount of MTW Funds Invested into the Property?</b> |
|-------------------------------|---------------|-------------|-------------|-------------|-------------|--------------|--------------------|-------------------------|--------------------------------------|---|--|--|---|
| 0                             | 0.00          | 0.00        | 0.00        | 0.00        | 0.00        | 0.00         | 0.00               |                         |                                      | 0.00  | 0.00   |  | 0.00  |
| <b>Totals</b>                 | 0             | 0           | 0           | 0           | 0           | 0            | 0                  |                         |                                      | 0   | 0  |  |   |

| G.4   | Comparable Mix (by Family Size) – Local, Non-Traditional.         |
|---|---|
| To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table. |   |
| Family Size:  | Occupied Number of Local, Non-Traditional units by Household Size |
| 1 Person  | 0   |
| 2 Person  | 0   |
| 3 Person  | 0   |
| 4 Person  | 0   |
| 5 Person  | 0   |
| 6+ Person   | 0   |
| Totals  | 0   |

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

| I.                    | Evaluations. |
|-----------------------|--------------|
| No known evaluations. |              |

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

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

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

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

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).*

Wixie Stephens

Board Chairman

**NAME OF AUTHORIZED OFFICIAL****TITLE**


June 6, 2022

**SIGNATURE****DATE**

\* *Must be signed by either the Chairperson or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.*

## 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 RCHA established amount (with exceptions for hardships and triennial income reexaminations).

The Stepped Rent policy will increase tenants rent annually by an amount unrelated to each household's income. The *annual stepped rent increase* will be a specific dollar amount, by unit size. It will be established by RCHA and can be set at 4% of the Fair Market Rent.

**Robeson County Housing Authority has chosen to use 4% of the Fair Market Rent.**

|                            | Initial Rent   | One Bedroom | Two Bedroom | Three Bedroom | Four Bedroom | Five Bedroom |
|----------------------------|--|-------------|-------------|---------------|--------------|--------------|
| Fair Market Rent           | Rent = to 30% of Annual gross income in the <b>prior year</b> , or a minimum rent of \$50 (whichever is larger). | \$550       | \$724       | \$919         | \$1,021      | \$1,174      |
| Maximum Rent Increase (4%) |  | \$22.00     | \$28.96     | \$36.76       | \$40.84      | \$46.96      |



## **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 Answers

Complex: **West Gate Terrace**

Date:06/02/2021

### 1. Outside resources -None Mentioned.

a,b) Staff was knowledgeable. Staff informed some residents about what was needed and the next steps of process. Most Residents had to call to be informed about their status.

### 2. Intake process, transfers, and follow up on transfers

a) Move in process- Waiting list is long and no one contacted for updates or to be removed from waiting list

b) Application process was sooth- knew information that was needed to complete (Birth Certificates, Social Security Cards, Picture ID) Something to look into would be accepting vouchers but would not consider Section 8.

3. Services for Residents included: the GED Program or High School Equivalency, the High School Equivalency program is committed to promoting educational opportunities to the diverse populations of Robeson County and the surrounding regions. HUD, local public housing agencies, and other stakeholders administer programs aimed at helping HUD-assisted households achieve self-sufficiency through various supports such as counseling, job training, child care, health services, transportation assistance, and savings incentives was of interest this was included in the Step Rent and MtW Self- Sufficiency Program. The Housing Authority would like to design a youth program to prevent the use of drugs and violence, promote academic achievement, and build the life skills necessary to become outstanding members of the community in adulthood.



4&5. All Tenants agree that the affordable rent has help them stay in their current residence. But getting a job or working more hours comes with increases in rent and benefits that are cut like child care and food nutrition before tenants can get on their feet this was explained as the Stepped Rent Program and how it would increase over the course of 6 months.

6. Full time management at West Gate Terrace and Good Housekeeping Incentive and the Alternative Reexamination Schedule and paying rent would assure in keeping current housing.

7. Some Residents agreed that they were considering West Gate Terrace for long term housing.

Capitol Funds Projects discussed were security cameras, heat/air duct work and upsizing units, addressing plumbing, sheet rock (ceiling and walls) and flooring issues.

## Focus Group Answers

Complex: **Benton Court**

Date:06/9/2021

1. Outside resources -None Mentioned.

a,b)Staff was knowledgeable. Staff informed residents about what was needed and the next steps of process.

2. Intake process, transfers, and follow up on transfers

a) Move in process- Waiting list is long and no one contacted for updates or to be removed from waiting list

b) Application process was sooth- knew information that was needed to complete (Birth Certificates, Social Security Cards, Picture ID)

c) 1 month was the average wait on the waiting list

3. Services for Residents included: the GED Program or High School Equivalency, the High School Equivalency program is committed to promoting educational opportunities to the diverse populations of Robeson County and the surrounding regions. Also obtaining driver's license is a goal and would help with better jobs. MtW Self-Sufficiency Program (Goal #2)

4&5. All Tenants agree that the affordable rent has help them stay in their current residence. But getting a job or working more hours comes with increases in rent and benefits that are cut like child care and food nutrition before tenants can get on their feet. This was explained as Goal #2 Stepped Rent which takes place over a 6-month period.

6. A drop box for rent was suggested for timely payments and monthly activities for Residents would be appreciated. Good Housekeeping Incentive (Goal #1)and paying rent would assure in keeping current housing.

7. Some Residents agreed that they were considering Benton Court for long term housing.

Capitol Funds Projects discussed were fencing on property line for a gated community effect, security cameras in front and back for trespassing and thief deterrence, and park or playground area with a basketball courts, smoking shelters/transit areas (Bus Stops), Removal of the “popcorn” ceiling and flat paint in all apartments, and pressure washing the outside of apartments.

## Focus Group Answers

Complex: **McColl Page**

Date:06/16/2021

1. Outside resources for rent assistance and utilities like the Lumbee Tribe.

- a) Staff was knowledgeable.
- b) The address for Saint Pauls was not recognized by the Utility Company
- c) No, Staff did not walk tenant through apartment before signing move in inspection. Staff did not keep tenant informed about the status of Waiting List.

2. Intake process, transfers, and follow up on transfers

- a) Move in process- Waiting list is long and no one contacted for updates or to be removed from waiting list
- b) Application process was sooth- knew information that was needed to complete (Birth Certificates, Social Security Cards, Picture ID)
- c) 5 years was the longest time and 3 months was the shortest for an apartment

3. Services for Residents included: clean the utility room in the back, stair wells/stairways outside and painting the apartments to rid the flat paint used from previous years. The "Waiting List" will be automated via telephones in the near future. A system for appliance replacement not just when they can not be fixed. Waxing tile floor periodically. Ants are a nuisance especially around trash cans that are kept near the front door looking for a new area to keep the trash containers.

4&5. All Tenants agree that the affordable rent and the Alternative Reexamination Schedule (Goal #1) would help them stay in their current residence.

6. A drop box for rent was suggested for timely payments and monthly activities for Residents would be appreciated. Good Housekeeping Incentive (Goal #1) and paying rent would assure in keeping current housing.

7. All Residents agreed that they were considering McColl Page for long term housing.

Capitol Funds Projects discussed were fencing on property line, new benches through out complex, security cameras in front and back for trespassing and thief deterrence, smoking shelters/transit areas with cigarette receptacles



## **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.

### **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.



## IMPACT ANALYSIS

| Activity  | 1.c Stepped Rent (PH)- gradually increase rent payments cumulatively by 15% over the course of 6 months |
|---|---|
| <b>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).</b>  |   |
| We anticipate a decrease in rent collected during the interim phase of each tenant's step plan. In the long-term costs will be offset through improved self-sufficiency which could lead to the tenant's ability to cover their rent. We foresee more tenants obtaining employment and working longer due to their rent increase being on a fixed schedule in both frequency and amount.                                |   |
| <b>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).</b>   |   |
| We anticipate significant benefits to families as well as increased housing choice and self-sufficiency. The Stepped Rent program will encourage full- and part-time employment options.  |   |
| <b>3. Describe the impact on the agency's waitlist(s) (e.g., any change in the amount of time families is on the waitlist).</b>   |   |
| None expected. Families may achieve self-sufficiency more quickly than in the past, opening units and reducing wait times.  |   |
| <b>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).</b>  |   |
| No change expected. Possible reduction in termination rate with more families achieving self-sufficiency.   |   |
| <b>5. Describe the impact on the agency's current occupancy level in public housing and utilization rate in the HCV program.</b>  |   |
| None Expected   |   |
| <b>6. Describe the impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice.</b>  |   |
| 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 supporting tenants in gaining & mainlining employment which could lead to the tenant's ability to cover their rent and/ or save for a rental deposit or homebuyer down payment. |   |
| <b>7. Describe the impact on the agency's ability to meet the MTW statutory requirements.</b>   |   |
| 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.   |   |
| <b>8. Describe the impact on the rate of hardship requests and the number granted and denied as a result of this activity.</b>  |   |

|   |
|---|
| We anticipate a slight increase in hardship requests and the number granted/denied due to the factors affecting employment. |
|---|

|   |
|---|
| <b>9. Across the other factors above, describe the impact on protected classes (and any associated disparate impact).</b> |
|---|

|  |
|--|
| None expected because the program will not be mandatory. |
|--|



## IMPACT ANALYSIS

| Activity   | 11.a MTW Self-Sufficiency Program-<br>Alternative Family Selection<br>Procedures (PH)- Mandatory for<br>eligible families |
|--|---|
| <b>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)</b>  |   |
| 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.   |   |
| <b>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).</b>  |   |
| 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.   |   |
| <b>3. Describe the impact on the agency's waitlist(s) (e.g., any change in the amount of time families is on the waitlist).</b>  |   |
| None expected. Families may achieve self-sufficiency more quickly than in the past, opening units and reducing wait times.   |   |
| <b>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).</b>   |   |
| 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.   |   |
| <b>5. Describe the impact on the agency's current occupancy level in public housing and utilization rate in the HCV program.</b>   |   |
| None expected  |   |
| <b>6. Describe the impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice.</b>   |   |
| 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. |   |
| <b>7. Describe the impact on the agency's ability to meet the MTW statutory requirements.</b>  |   |
| 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.  |   |
| <b>8. Describe the impact on the rate of hardship requests and the number granted and denied as a result of this activity.</b>   |   |

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 pf 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).**

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.

**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 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.

**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 keeping more of their earned income 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 change expected. Possible reduction in termination rate with recertification less often and household keeping income increases for that time.

**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 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.

**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 staff time saved through less frequent certification improves 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.**

None expected. This change should be an advantage for all households, and households can request an interim certification annually.

**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  | 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 (January 1st) in both frequency (once per year) and amount |
|---|---|
| <b>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).</b>  |   |
| We anticipate a decrease in rent collected during the interim phase of each tenant's step plan. In the long-term costs will be offset through improved self-sufficiency which could lead to the tenant's ability to cover their rent. We foresee more tenants obtaining employment and working longer due to their rent increase being on a fixed schedule in both frequency and amount.                                |   |
| <b>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).</b>   |   |
| We anticipate significant benefits to families as well as increased housing choice and self-sufficiency. The Stepped Rent program will encourage full- and part-time employment options.  |   |
| <b>3. Describe the impact on the agency's waitlist(s) (e.g., any change in the amount of time families is on the waitlist).</b>   |   |
| None expected. Families may achieve self-sufficiency more quickly than in the past, opening units and reducing wait times.  |   |
| <b>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).</b>  |   |
| No change expected. Possible reduction in termination rate with more families achieving self-sufficiency.   |   |
| <b>5. Describe the impact on the agency's current occupancy level in public housing and utilization rate in the HCV program.</b>  |   |
| None Expected   |   |
| <b>6. Describe the impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice.</b>  |   |
| 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 supporting tenants in gaining & mainlining employment which could lead to the tenant's ability to cover their rent and/ or save for a rental deposit or homebuyer down payment. |   |
| <b>7. Describe the impact on the agency's ability to meet the MTW statutory requirements.</b>   |   |



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/denied due to the factors affecting employment.

**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. All residents can participate



## IMPACT ANALYSIS

| Activity   | 11.a MTW Self-Sufficiency Program-<br>Alternative Family Selection<br>Procedures (PH)- Mandatory for<br>eligible families |
|--|---|
| <b>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)</b>  |   |
| 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.   |   |
| <b>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).</b>  |   |
| 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.   |   |
| <b>3. Describe the impact on the agency's waitlist(s) (e.g., any change in the amount of time families is on the waitlist).</b>  |   |
| None expected. Families may achieve self-sufficiency more quickly than in the past, opening units and reducing wait times.   |   |
| <b>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).</b>   |   |
| 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.   |   |
| <b>5. Describe the impact on the agency's current occupancy level in public housing and utilization rate in the HCV program.</b>   |   |
| None expected  |   |
| <b>6. Describe the impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice.</b>   |   |
| 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. |   |
| <b>7. Describe the impact on the agency's ability to meet the MTW statutory requirements.</b>  |   |
| 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.  |   |
| <b>8. Describe the impact on the rate of hardship requests and the number granted and denied as a result of this activity.</b>   |   |

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 pf 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

**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).**

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.

**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 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.

**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 keeping more of their earned income 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 change expected. Possible reduction in termination rate with recertification less often and household keeping income increases for that time.

**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 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.

**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 staff time saved through less frequent certification improves 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.**

None expected. This change should be an advantage for all households, and households can request an interim certification annually.

**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