

PHA Name : Robeson County

PHA Code : NC084

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2024

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.

The Robeson County Housing Authority (RCHA) operates as an approved Moving to Work (MTW) agency, granting it extensive flexibility to propose regulatory waivers that aim to foster family self-sufficiency, expand housing options, and improve cost-effectiveness by streamlining regulations. In 2024, RCHA plans to maintain the majority of the MTW initiatives outlined in its approved 2023 MTW Supplement. The following adjustments will be implemented in the 2024 MTW Supplement:

- Tenant reexaminations for working and fixed-income families will be reduced to once every three years, as opposed to annually for all households.
- Robeson County will establish a minimum rent exceeding existing statutory and regulatory limits.
- The FSS Contract of Participation (HUD-52650) terms will be either modified or eliminated in favor of a local form.
- RCHA will introduce an alternative framework to secure local resources to support an MTW Self-Sufficiency Program.

MTW Objective 1: Decrease Costs and Improve Cost-Efficiency in Federal Expenditures

- Tenant reexamination frequency will transition to once every three years for working and fixed-income families, with one interim adjustment annually available upon request if the household's gross income decreases by 10% or more.
- The extended recertification cycle aims to reduce administrative burdens and lessen the time families spend on income reporting.
- Robeson County will continue to enforce the revised Public Housing Admissions and Continued Occupancy Policy (ACOP).
- Utility reimbursement payments in the public housing program will cease when the utility allowance surpasses the total tenant payment.
- A gradual increment in minimum rent from \$50.00 to \$100.00 will commence for current residents in July 2024.

MTW Objective 2: Incentivize Families with Employed Heads of Household

- RCHA will revise the terms of the FSS Contract of Participation and implement alternative procedures for the MTW Self-Sufficiency Program.
- The introduction of the BRIDGE program will offer youth and adult residents opportunities to enhance essential skills and engage with the community.
- The TIDY initiative will concentrate on enhancing housekeeping practices to reduce maintenance expenses and preserve housing stock.

MTW Objective 3: Broaden Housing Options for Eligible Low-Income Families

- RCHA will pursue non-profit status and expand its housing portfolio to better address local demands.
 - RCHA will be granted authorization to acquire public housing sites without prior HUD approval.
- MTW funds will be allocated towards acquiring, renovating, and constructing affordable housing units for low-income families, incorporating predevelopment expenses into the 5-year capital funds plans.

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	
e. Minimum Rent (PH)	Plan to Implement in the Submission Year
m. Utility Reimbursements (PH)	Currently Implementing
2. Payment Standards and Rent Reasonableness	
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Currently Implementing
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	
d.PH Modify or Eliminate the Contract of Participation (PH)	Plan to Implement in the Submission Year
e.PH Policies for Addressing Increases in Family Income (PH)	Currently Implementing
11. MTW Self-Sufficiency Program	
a.PH Alternative Family Selection Procedures (PH)	Currently Implementing
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.e. - Minimum Rent (PH)
<p>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</p> <p>Robeson County will set a minimum rent that is higher than allowed under current statute and regulation. RCHA will increase its rent from \$50.00 to \$100.00. Starting July 1, 2024 new residents will pay \$100.00. Currently 24.8% of RCHA's 290 households have a TTP of \$0 or \$50.00. Current resident will be phased in over a 3-year period (See Chart 1 below). Attached is By March 30, 2024 RCHA will amend the Public Housing Admissions and Continued Occupancy Policy (ACOP) and gain board approval. This MTW activity contributes to family self sufficiency and cost effectiveness for the agency.</p> <p>Minimum Rent Impact Analysis Chart: Number of Families Per Complex that have a TTP 0\$**or \$50*</p> <p>Westgate Terrace 4 2 *</p> <p>Benton Court 9 **</p> <p>Morgan Britt 16 **</p> <p>McColl Page Plaza 5 **</p> <p>Total 72</p> <p>Percentage out of 290 Families 24.8%</p> <p>Additional Information: Current Revenue \$50.00 X 42 families = \$2,100 \$2,100 x 12 months = \$25,200</p>

Projected Revenue \$100 x 42 families = \$4,200
\$4,200 x 12 months =\$50,400
Projected Increase \$25,200
Families with a TTP of 0 rent increase will varies due to utility allowance

Impact Analysis
Chart1: Rent Increase Chart for Current Residents
Date Amount
July 1, 2024 \$50.00
July 1, 2025 \$75.00
July 1, 2026 \$100.00

RCHA will exclude elderly and disabled families from rent policy. RCHA will conduct an impact analysis and implement a hardship policy.

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

Cost effectiveness; Self-sufficiency

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

Increased 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 only to a subset or subsets of assisted households

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

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

N/A

Does this MTW activity require a hardship policy?

Yes

This document is attached.

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

Yes

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

multiple MTW activities.) 1.e. - Minimum Rent (PH)
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement? Yes
What considerations led the MTW agency to modify the hardship policy? To include new waivers
How many hardship requests have been received associated with this activity in the past year? No hardship were requested in the most recent fiscal year.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? Yes
What is the status of the Safe Harbor Waiver request?
Does the MTW activity require an impact analysis? Yes This document is attached.
Does the impact analysis apply to more than this MTW activity? Yes
Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.) 1.e. - Minimum Rent (PH)
How much is the minimum rent or minimum Total Tenant Payment (TTP)? \$100.00

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 Approved in the Fiscal Budget of July 1, 2023, the Robeson County Housing Authority made the decision to discontinue Utility Reimbursements (UR) when the Utility allowance surpasses the Total Tenant Payment (TTP). This measure aimed to streamline the process by eliminating the need to issue checks and mail them to utility providers. In the forthcoming period, the RCHA intends to raise the minimum rent, consequently reducing the number of households eligible for UR. This adjustment will not escalate the per-family contribution to the agency but will require approximately 72 families to bear a higher portion of their housing expenses as the reimbursement checks for utility costs will cease. This modification will not impact the waiting list, family termination rates, or utilization rates but will enhance cost efficiency by eliminating the issuance of UR checks, allowing resources to be redirected towards other residential initiatives within the RCHA. Moreover, this alteration supports self-sufficiency by fostering accountability among families for their utility usage.
Which of the MTW statutory objectives does this MTW activity serve? Cost effectiveness; Self-sufficiency
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on

what you know today.

Increased 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 only to a subset or subsets of assisted households

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

New admissions and currently assisted households

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

The MTW activity applies to all family types

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

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

This fiscal year Robeson County Housing Authority eliminated utility reimbursement payments when the unity allowance was greater than the TTP. This activity has been cost effective for the agency because it has saved staff time due to the fact they no longer have to calculate and issue UR reimbursement checks. The agency also saved the funds that was normally sent to the utility company in the form of a utility credit for the tenant. Below is a chart displaying the amount of money saved per complex via Utility Reimbursement in 2023

- Benton Court \$ 2127.53
 - Benton Court \$ 2127
 - Morgan Britt \$ 2837.06
 - McColl Page \$ 796.6
 - Westgate Terrace- \$0 (No UA- RCHA Pay Utilities)
- Total \$ 5, 761.27

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 plans to decrease the frequency of tenant reexaminations to every three years for both working and fixed-income families. An interim adjustment can be requested once a year by the household if their gross income has dropped by 10% or more. The shift to triennial reexaminations aligns with MTW statutory goals by incentivizing increased work and earnings, leading to reduced costs and enhanced efficiency in federal spending. It also encourages family self-sufficiency, especially among households with working heads and children. This change extends the period between eligibility reassessments for total tenant payment (TTP), known as "recertification," reducing staff time, paper usage, and increasing rent collection efficiency, thereby decreasing the need for federal funds in programs and projects.

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

Cost effectiveness; Self-sufficiency

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

Increased 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 only to a subset or subsets of assisted households
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? New admissions and currently assisted households
Does the MTW activity apply to all family types or only to selected family types? The MTW activity applies only to selected family types
Please select the family types subject to this MTW activity. Other – another specifically defined target population or populations.
If Other Selected in Previous Question: Please describe this target population in the text box. RCHA plans to decrease the frequency of tenant reexaminations to every three years for both working and fixed-income families
Does the MTW activity apply to all public housing developments? The MTW activity applies to all developments
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. On July 1, 2023, RCHA began phasing working and fixed income families into the triennial reexamination cycle by recertification date. All current residents will be on the new cycle by June 30, 2024. New residents that work or on a fix income will start the triennial cycle at the time of move-in.
Does this MTW activity require a hardship policy? Yes This document is attached.
Does the hardship policy apply to more than this MTW activity? Yes
Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.) 1.e. - Minimum Rent (PH); 3.a. - Alternative Reexamination Schedule for Households (PH)
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement? Yes
What considerations led the MTW agency to modify the hardship policy? New waivers added
How many hardship requests have been received associated with this activity in the past year? No hardship were requested in the most recent fiscal year.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No
Does the MTW activity require an impact analysis?
Yes
This document is attached.
Does the impact analysis apply to more than this MTW activity?
No
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.
If there are changes in the composition of the family household under the alternative Rexam schedule, such as births, adoptions, court-awarded custody, or a member permanently leaving the household, RCHA will perform an interim assessment when the lease is modified. This adjustment may result in either a decrease or increase in the Total Tenant Payment (TTP) of the household. The TTP will remain in effect until the subsequent scheduled reexamination. In cases of hardship, the family is entitled to request one interim assessment per year. Nonetheless, modifications to the family household will be addressed as they occur.

10.d.PH - Modify or Eliminate the Contract of Participation (PH)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative
The FSS contract of participation (COP) serves to outline the key terms and conditions governing involvement in the FSS program, incorporating the individual training and services plan (ITSP) as a necessary component of the contract. Through the ITSP, goals are established for FSS families to achieve as they progress towards self-sufficiency. RCHA will adapt the COP terms (HUD-52650) instead of using a local form, aligning them with modifications to the MTW FSS Program under MTW flexibility. This waiver is in line with MTW guidelines, enabling RCHA to establish effective guidelines for implementing the MTW FSS program, reducing costs, improving cost efficiency in federal spending, and promoting self-sufficiency. These adjustments are detailed in RCHA's approved FSS Action Plan. The RCHA MTW FSS Contract of Participation includes the following stipulations:
<ul style="list-style-type: none"> i. The Contract will have an initial term of 5 years, and for good cause in the discretion of RCHA, may be extended between 1 and 5 additional years. ii. Any adult member of an eligible FSS family may sign the Contract and work to complete the individualized training and services plan, not just the head of household, but there will be only one Contract per family. iii. If the Contract is ended for any reason other than the participant's failure or refusal, without good cause, to comply with the terms of the Contract, then the Contract will be considered nullified rather than terminated, and the FSS escrow funds earned to that date will be distributed to the family. iv. If the person who signed the Contract becomes permanently disabled and unable to work or dies during the period of the Contract and it is not possible to modify the Contract to designate a new adult in the FSS family, then the Contract will be nullified and escrow funds will be disbursed to the family. v. If the FSS family's income grows to a point that the standard HUD rent calculation (30% of income) would exceed the Fair Market Rent, the family will not be required to end their FSS participation, so long as they continue to be a program participant. vi. Interest earned in RCHA'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. vii. In order to successfully graduate from the FSS program the family must be independent from applicable welfare assistance at the time of graduation, but it will not be necessary for that independence to be demonstrated for 12 months.

viii. The contract of participation (CoP) may be modified, as long as the PHA and the FSS family mutually agree to modify it.

viii. The PHA will continue to offer supportive services to a former FSS family who has completed its contract of participation.

Safe Harbor Provisions:

- i. We have reviewed the HUD FSS guidance as required by the Operations Notice including the Promising Practices Guidebook and Online Training.
- ii. We will execute a Contract of Participation, or other locally developed agreement, that is at least five years and no more than ten years, with each participant in our FSS program.
- iii. Prior to implementation, we will ensure that we have an up-to-date approved FSS Action Plan in accordance with 24 CFR 984.201 that incorporates all modifications to the FSS program approved through this waiver.
- iv. We will not require MTW FSS Program participation as a condition for housing subsidy for elderly and disabled families.
- v. We do not plan to require MTW FSS Program participation as a condition for receiving a housing subsidy at this time, but if that changes in the future, we will prepare and submit the required impact analysis first.
- vi. We do not plan to require MTW FSS Program participation as a condition for housing subsidy at this time, but if that changes in the future, we will prepare and submit the required hardship policy first.
- vii. We will not make MTW FSS Program participation mandatory for individuals who do not meet the definition of an eligible family at section 23(n)(3) of the 1937 Act, and those exempted from the Community Service Requirement under section 12(c)(A-E) of the 1937 Act.
- viii. We do not plan to require MTW FSS Program participation as a condition for housing subsidy at this time, but if we adopt a mandatory MTW FSS Program in the future and a decision is made to terminate the housing subsidy or tenancy of a family for alleged violation of mandatory MTW FSS Program Participation, the family will be entitled to a Hearing under the PHA informal hearing process (24 CFR part 966; RCHA ACOP).
- ix. We will not use income increases during participation in the MTW FSS Program to change a family's eligibility status for purposes of participation in the MTW FSS Program or for the receipt of public housing assistance.

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.

N/A

Does this MTW activity require a hardship policy?

No

No document is attached.

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

No

Does the MTW activity require an impact analysis?

No

No document is attached.

10.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 will change the traditional calculation of funds deposited to escrow for FSS participants. 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 is listed in Table 1. of the FSS Action Plan and may be amended from time to time with approval of the Board of Commissioners. This modification puts families on a level playing field for escrow earnings and emphasizes the importance of specific FSS goals. It also makes the calculation of escrow deposits simpler, more transparent, and more reliable. Additionally, this waiver is in line with MTW guidelines, enabling RCHA to establish effective guidelines for implementing the MTW FSS program, reducing costs, improving cost efficiency in federal spending, and promoting self-sufficiency.

Safe Harbor Provisions:

- i. We have reviewed the HUD FSS guidance as required by the Operations Notice including the Promising Practices Guidebook and Online Training.
- ii. We will execute a Contract of Participation, or other locally developed agreement, that is at least five years and no more than ten years, with each participant in our FSS program.
- iii. Prior to implementation, we will ensure that we have an up-to-date approved FSS Action Plan in accordance with 24 CFR 984.201 that incorporates all modifications to the FSS program approved through this waiver.
- iv. We will not require MTW FSS Program participation as a condition for housing subsidy for elderly and disabled families.
- v. We do not plan to require MTW FSS Program participation as a condition for receiving a housing subsidy at this time, but if that changes in the future, we will prepare and submit the required impact analysis first.
- vi. We do not plan to require MTW FSS Program participation as a condition for housing subsidy at this time, but if that changes in the future, we will prepare and submit the required hardship policy first.
- vii. We will not make MTW FSS Program participation mandatory for individuals who do not meet the definition of an eligible family at section 23(n)(3) of the 1937 Act, and those exempted from the Community Service Requirement under section 12(c)(A-E) of the 1937 Act.
- viii. We do not plan to require MTW FSS Program participation as a condition for housing subsidy at this time, but if we adopt a mandatory MTW FSS Program in the future and a decision is made to terminate the housing subsidy or tenancy of a family for alleged violation of mandatory MTW FSS Program Participation, the family will be entitled to a Hearing under the PHA informal hearing process (24 CFR part 966; RCHA ACOP).
- ix. We will not use income increases during participation in the MTW FSS Program to change a family's eligibility status for purposes of participation in the MTW FSS Program or for the receipt of public housing assistance.

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

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.

RCHA's MTW FSS Action Plan with approved.

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.

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

The following is how increased earnings is treated:

Rather than calculating escrow on increased earnings, the following Table 1 will be used to determine escrow contributions based on accomplishments by the participant. Additionally, through MTW flexibility RCHA currently implements triennial reexaminations. Therefore, program participants increased earnings will be assessed at their time of their recertification and the TTP will be adjusted accordingly.

Table 1: Summary of Awards

I. FSS Engagement Signed COP & ITSP (Enrollment):

\$250
Active Participation (Quarterly)
\$75
Graduation from FSS

\$2,000
Education/Training
Complete High School Equivalency (GED)
\$500

Complete Training/Certificate Program
\$750
Earn Associate Degree or Higher
\$2,000

III. Employment :

New Employment (1st entry after enrollment)
\$500
Employment Promotion
\$750

Employment Retention (awarded annually)
\$500
Childcare (voucher or other reliable)
\$250

State Issued Driver's License
\$250
Reliable Transportation (personal vehicle)
\$500

IV. Lease:

Timely Rent Payments (awarded annually)
\$250
No Lease or Housekeeping Violations (awarded annually)
\$250

Resident Association Leadership (awarded annually)
\$250

V. Financial Strength/ Asset Building:

Engage in Financial Education/Counseling Program
\$250

Improve credit score to 640

\$1,000

Increase Personal Savings (match up to \$2,000 at graduation)
variable

VI. Homeownership:

Complete Homeownership Training Program

\$500

Closing on Purchase of Home

\$2,500

Transition off of Housing Subsidy

\$2,500

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

RCHA will establish distinct recruitment and selection protocols tailored for its MTW Self-Sufficiency Program. Comprising two key elements, Bridge and TIDY, these components are integral to RCHA's objective of minimizing expenses and enhancing cost efficiency in Federal Expenditures by promoting family self-sufficiency, preserving units, and reducing the necessity for direct resident engagement and manual apartment maintenance.

BRIDGE Program

The RCHA plans to introduce the BRIDGE program, a basic skill set initiative under MTW, aiming to decrease intergenerational poverty and enhance self-sufficiency for youth and adult residents. This program targets non-working residents not enrolled in the FSS program, with a goal to prepare and motivate adult participants to join the FSS program eventually. Incentives will be utilized to engage children and teenagers in after-school activities they may not have initially considered, promoting attendance and fostering a sense of commitment. When selecting and implementing incentives, RCHA will take into account participants' ages, program requirements, potential supporters, and devise a strategy to secure support. Various youth programs such as Report Card Rewards, A Clean and Green Community Program, Summer Youth Work Program, Tool Time with Teens, Sports Participation Programs, and others suitable for youth development will be introduced. For adults, the program will include skills assessment/job readiness training, health assessment and service referrals, transportation and child care assistance, basic financial literacy and credit education, and ready-to-rent training.

TIDY (Techniques to Improve & Discipline Yourself)

To enhance cost-effectiveness in federal expenditures, RCHA will simplify unit inspections for Public Housing residents and introduce a \$50.00 incentive for good housekeeping to preserve housing stock and reduce maintenance expenses. Moving from annual to biannual inspections in 2022, RCHA will launch the incentive program in 2023. Additionally, RCHA will implement the TIDY program (Techniques to Improve & Discipline Yourself) to aid families in achieving self-sufficiency. TIDY will educate residents on techniques to save money at home, thereby reducing maintenance costs and utility expenses. Residents will also receive guidance on budget-friendly cleaning methods. The primary objective of TIDY is to empower residents to maintain their homes independently as they transition out of public housing.

Safe Harbors:

i. RCHA not require MTW Self-Sufficiency Program participation as a condition for housing subsidy for elderly and disabled families.*

RCHA will not require MTW Self-Sufficiency Program participation as a condition for housing subsidy, an impact analysis must be developed and adopted in accordance with MTW guidance prior to the implementation of the activity. iii. RCHA will not require MTW Self-Sufficiency Program participation as a condition for housing subsidy, a hardship policy must be developed and adopted in accordance with MTW guidance prior to the implementation of the activity.*

RCHA will not 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 U.S. Housing Act of 1937 (1937 Act) and those exempted from the Community Service Requirement under section 12(c)(2)(A), (B), (D) and (E) of the 1937 Act.*

RCHA will not make MTW Self-Sufficiency Program participation mandatory, but if we do in the future RCHA will not terminate the housing subsidy or tenancy of a family for alleged violation of mandatory MTW Self-Sufficiency Program participation, the family will be entitled to a hearing under the agency's Grievance Procedure (24 C.F.R. part 966, subpart B).

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

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

Cost effectiveness; Self-sufficiency

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

Increased 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.

Since the inception of the MTW Self-Sufficiency Program, RCHA has implemented various initiatives including:

- Clean & Green: A project where youth were paid to clean up the community during the summer, with 14 participants across PHA.
- In 2023, two youth residents participated in report card rewards and were rewarded with gift cards for achieving A or AB honor roll during the school year.
- Starting in 2022, biannual inspections were introduced.
- In 2022, 81 residents failed their annual inspection, which decreased to 62 in 2024.
- In 2022, thirty head of households who failed inspections participated in TIDY, with a 100% reinspection pass rate.
- In 2024, 3 individuals joined TIDY for the first time, which is a one-time offering for residents who fail inspection. All 3 participants successfully passed their reinspection.

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.

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

No

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 have the authority to acquire public housing sites without prior HUD approval. This change offers flexibility regarding the timing of HUD's approval, not the content. When acquiring these sites, RCHA will ensure that all submission materials are ready as if HUD had already approved the acquisition proposal beforehand. Within 30 days of acquisition, RCHA will submit these materials to the field office for approval. This waiver will remain in effect to seize opportunities that may arise for expanding affordable housing in Robeson County, enabling RCHA to effectively compete and collaborate with private entities in real estate ventures. This waiver is in line with MTW guidelines as it creates opportunities for RCHA to implement projects that enhance housing options for eligible low-income families.

Safe Harbors

The RCHA will comply with and have documentation that the project is in compliance with local zoning as described in 24 C.F.R. 905.608(e).*

The RCHA will commission an independent appraisal of the site as described in 24 C.F.R. 905.608(f).*

Prior to acquisition, the RCHA will conduct an environmental assessment as described in 24 C.F.R. 905.608(h).*

The RCHA will provide all required documents to HUD within 30 days of the 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; Increased expenditures

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

The MTW activity applies to all assisted households

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

Robeson County Housing Authority used \$250,000 from approved Capital Funds allocated for MTW to purchase 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 was awarded funding 3 million from the North Carolina Housing Finance Agency build 15 affordable housing units on the land.

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

. Seek Non-Profit status and increase housing portfolio.

In the 2022 Supplement, RCHA used its flexibility to develop a nonprofit affiliate. In 2024, 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.

This waiver will remain in effect to seize opportunities that may arise for expanding affordable housing in Robeson County, enabling RCHA to effectively compete and collaborate with private entities in real estate ventures. This waiver is in line with MTW guidelines as it creates opportunities for RCHA to implement projects that enhance housing options for eligible low-income families.

Safe Harbors

The RCHA do not have HAP funds, however if we do in the future then we will not spend more than 10% of its HAP budget on local, non-traditional activities.

The RCHA Families receiving housing or services through local, non-traditional activities must meet the HUD definition of low-income.*

The RCHA will be subject to Notice PIH 2011-45 or any successor notice and/or guidance.*

The RCHA will comply with section 30 of the 1937 Housing Act.*

The RCHA fully understands that any MTW Funding awarded to a third-party provider must be competitively bid.*

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.

RCHA was awarded funding to build 15 units for youth aging out of foster.

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, Mixed Financing	15.00	15.00	15.00	0.00	0.00	0.00
Westgate Terrace	Rehabilitation	Gap Financing, Mixed Financing	100.00	100.00	100.00	0.00	0.00	0.00

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

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
---------------------------------	--	--	----------------------------	-----------------------	---	---	---	--

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
	Land Purchase for New Construction	Other- funds was used to purchase land for a Supportive Housing Development Project	15.00	15.00	15.00	0.00	0.00	0.00

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
2024	\$1,200,000	\$703,217	\$496,783	2025-06-30
2023	\$1,184,780	\$1,184,780	\$0	2024-06-30
2022	\$1,115,617	\$1,115,617	\$0	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?
------------------------	--------	------	------	------	------	-------	-------------	------------------	-------------------------------	--	---	---	--

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 07/01/2024, hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

NC 084

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).

John Cummings

Board of Commissioners Chairman

NAME OF AUTHORIZED OFFICIAL

TITLE

SIGNATURE

04/15/2024

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.*



MTW HARDSHIP POLICY

This hardship policy applies to the following MTW activities:

- 1) Alternative Reexamination Schedule: Triennial Certification and Interim Requests.
- 2) Minimum Rent; and
- 3) Utility Reimbursements

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

III. OVERVIEW OF MTW ACITIVITIES

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. 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. **Minimum Rent (PH)**

Robeson County will set a minimum rent that is higher than allowed under current statute and regulation. RCHA will increase its rent from \$50.00 to \$100.00. Starting July 1, 2024 new residents will pay \$100.00. Current resident will be phased in over a 3-year period (See Chart 1 below). By March 30, 2024 RCHA will amend the Public Housing Admissions and Continued Occupancy Policy (ACOP) and gain board approval. RCHA will exclude elderly and disabled families from rent policy. For households experiencing a hardship, RCHA will consider classifying it as a hardship according to the policies and guidelines above.

Date	Amount
July 1, 2024	\$50.00
July 1, 2025	\$75.00
July 1, 2026	\$100.00

c. **Utility Reimbursements** - 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. For households experiencing a hardship, RCHA will consider classifying it as a hardship according to the policies and guidelines above.

IV. 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

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

<p style="text-align: center;">Activity</p>	<p style="text-align: center;">10. Family Self-Sufficiency Program with MTW Flexibility: 10.b Alternative structure for establishing a PCC, 10.d. Modify or Eliminate the Contract of Participation (PH) & 10.e. Policies for addressing increases in family income (PH)</p>
<p>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>	
<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>	
<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>	
<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>	
<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>	
<p>None expected. Families may achieve self-sufficiency more quickly than in the past, opening units and reducing wait times.</p>	
<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>	
<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>	
<p>5. Describe the impact on the agency's current occupancy level in public housing and utilization rate in the HCV program.</p>	
<p>None expected</p>	
<p>6. Describe the impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice.</p>	
<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>	
<p>7. Describe the impact on the agency's ability to meet the MTW statutory requirements.</p>	
<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.

None expected.

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

Activity	Tenant Rent Policies 1.e Minimum rent 1n. Utility Reimbursements
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)	
This activity will have a positive impact on the agency's finances. This will be due to the agency collecting more in and rent and distributing less in unity reimbursements.	
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).	
Housing costs will go from \$50.00 to \$100.00 this cost is still affordable. Currently this waiver will only effect 25% of our households that have a TTP that is \$0 or \$50.	
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.	
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).	
Impact should be minimal and the agency will have a hardship policy for those who need it. From July 1, 2022-July 1, 2024 there was as total of 9 tenants with a TTP of \$50 evicted for nonpayment of rent.	
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 issuing unity reimbursement to assist in stabilization activities. This activity will improve self-sufficiency and housing choice by encouraging employment.	
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

Minimum Rent Impact Analysis Chart

Complex	Families with a TTP 0\$** or \$50*
Westgate Terrace	42 *
Benton Court	9 **
Morgan Britt	16 **
McColl Page Plaza	5 **
Total	72
Percentage out of 290 Families	24.8%
Additional Information	
Current Revenue	$\$50.00 \times 42 \text{ families} = \$2,100$ $\$2,100 \times 12 \text{ months} = \$25,200$
Projected Revenue	$\$100 \times 42 \text{ families} = \$4,200$ $\$4,200 \times 12 \text{ months} = \$50,400$
Projected Increase	\$25,200
<i>Families with a TTP of 0 rent increase will varies due to utility allowance</i>	

Resident Advisory Board 11/21/2023

1. MTW Goals

- Alternative Reexamination Schedule.
- Utility Reimbursements (PH)
- Minimum Rent (PH)
- Amended MTW supplement **adding 10.d to or plan: Modify or Eliminate the Contract of Participation (PH & HCV)**, which allows the agency to modify the terms of or eliminate the FSS Contract of Participation (HUD-52650), in lieu of a local form. Also, the agency may modify the terms of the Contract of Participation to align with adjustments made to its MTW FSS Program using MTW Flexibility. Further, the agency may discontinue the use of the Contract of Participation and instead employ a locally-developed agreement that codifies the terms of the participation.
- **Unanimous support for the proposed plan from tenants**

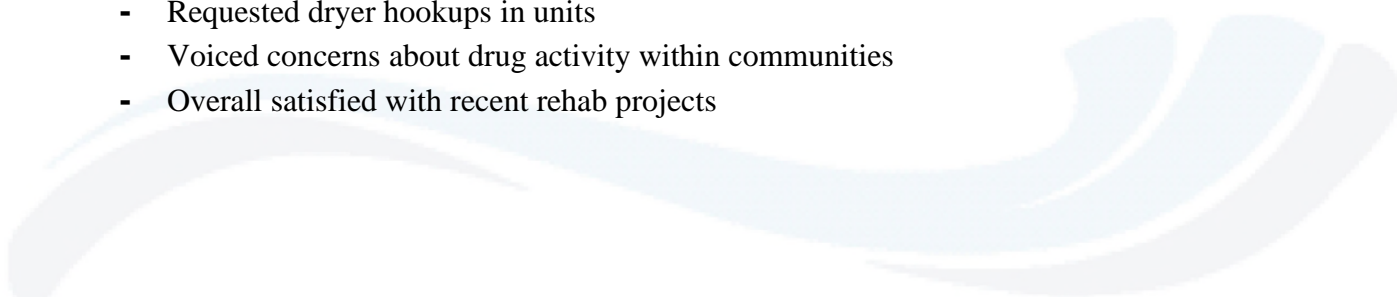
2. Next Phase/New Sit

- Youth aging out of foster care
- Vets
- Adults with disabilities
- Senior citizen

3. ROSS

- Assessment for GED
- Job Fair
- Provide gas vouchers to individuals who help with transportation.
- Tutoring Services
- Establishing a network of law enforcement and neighborhood watch

4. Tenant Comments/Concerns

- Expressed a preference for electronic newsletters over printed copies
 - Advocating for the establishment of a designated dump day or community clean-up project
 - Expressed positive feedback and approval of Report Card Reward Program
 - Requested dryer hookups in units
 - Voiced concerns about drug activity within communities
 - Overall satisfied with recent rehab projects
- 



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.