

**PHA Name : Rockville**

**PHA Code : MD007**

**MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 10/1/2022**

**PHA Program Type: Combined**

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

**MTW Supplement Submission Type: Annual Submission**

**B. MTW Supplement Narrative.**

Rockville Housing Enterprises (RHE) is situated in Rockville, Maryland. It was established in 1959 as the City of Rockville's public housing agency to provide affordable housing opportunities. RHE administers both the Public Housing and Housing Choice Voucher (HCV) programs as well as affordable housing options to all eligible households regardless of race, color, religion, sex, physical or mental handicap, familial status, national origin, or other protected class. RHE is dedicated to being an effective and innovative agency that enhances opportunities for self-sufficiency and provides quality affordable housing for the citizens of Rockville. The vision of RHE' Moving to Work (MTW) Program is to increase the self-sufficiency of its clients through addressing mental health impediments and removing barriers that discourage income increases, while achieving the highest level of internal operating efficiency.

**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)	Currently Implementing
d. Stepped Rent (HCV)	Currently Implementing
e. Minimum Rent (PH)	Currently Implementing
f. Minimum Rent (HCV)	Currently Implementing
o. Initial Rent Burden (HCV)	Currently Implementing
v. Alternative Income Inclusions/Exclusions (PH)	Currently Implementing
w. Alternative Income Inclusions/Exclusions (HCV)	Currently Implementing
<b>2. Payment Standards and Rent Reasonableness</b>	
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing
<b>3. Reexaminations</b>	
a. Alternative Reexamination Schedule for Households (PH)	Currently Implementing
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
c. Self-Certification of Assets (PH)	Currently Implementing
d. Self-Certification of Assets (HCV)	Currently Implementing
<b>4. Landlord Leasing Incentives</b>	
<b>5. Housing Quality Standards (HQS)</b>	
c. Third-Party Requirement (HCV)	Currently Implementing
<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>	
a. Increase PBV Program Cap (HCV)	Currently Implementing
b. Increase PBV Project Cap (HCV)	Currently Implementing
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Currently Implementing
f. Increase PBV HAP Contract Length (HCV)	Currently Implementing
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
<b>11. MTW Self-Sufficiency Program</b>	
<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>	
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
<b>17. Local, Non-Traditional Activities</b>	
c. Housing Development Programs	Currently Implementing

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

<b>1.c. - Stepped Rent (PH)</b>
RHE will increase client graduation from both the public housing and HCV programs and eliminate subsidy dependence by initiating a graduated total tenant payment (TTP) for workable families. The TTP will increase by the greater of the increase in TTP based on the increase in household income or 5% each year for families on annual recertifications schedules and 10% for families with triennial recertification schedules.
<b>This MTW activity serves the following statutory objectives:</b>
Cost effectiveness;Self-sufficiency
<b>This MTW activity has the following cost implications:</b>

Increased revenue;Decreased expenditures
<b>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.</b>
The MTW activity applies only to a subset or subsets of assisted households
<b>This MTW activity applies to:</b>
New admissions and currently assisted households
<b>An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).</b>
The MTW activity applies only to selected family types
<b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b>
RHE' FY22 MTW Supplement was approved in February 2022, and RHE has yet to fully implement this activity.
<b>This MTW activity requires a Hardship Policy. The Hardship Policy is attached.</b>
<b>Attached Hardship policy applies to:</b> 1.c. - Stepped Rent (PH);1.d. - Stepped Rent (HCV);1.e. - Minimum Rent (PH);1.f. - Minimum Rent (HCV);3.a. - Alternative Reexamination Schedule for Households (PH);3.b. - Alternative Reexamination Schedule for Households (HCV)}
<b>No hardship were requested in the most recent fiscal year.</b>
<b>In the prior year, under this activity, Rockville MTW agency</b>
Received 0 hardship requests
Approved hardship requests
Denied hardship requests
There is\are hardship requests pending.
<b>This MTW activity requires an Impact Analysis. The Impact Analysis is attached.</b>
<b>Please see the attached stepped rent schedule.</b>
<b>If a household progresses all the way through the stepped rent schedule,</b>
They will no longer receive a subsidy

<b>1.d. - Stepped Rent (HCV)</b>
RHE will increase client graduation from both the public housing and HCV programs and eliminate subsidy dependence by initiating a graduated total tenant payment (TTP) for workable families. The TTP will increase by the greater of the increase in TTP based on the increase in household income or 5% each year for families on annual recertifications schedules and 10% for families with triennial recertification schedules.
<b>This MTW activity serves the following statutory objectives:</b>
Cost effectiveness;Self-sufficiency
<b>This MTW activity has the following cost implications:</b>

Increased revenue;Decreased 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 only to a subset or subsets of assisted households

**This MTW activity applies to:**

New admissions and currently assisted households

**An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).**

The MTW activity applies only to selected family types

**The MTW activity applies to all tenant-based units**

**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.**

RHE' FY22 MTW Supplement was approved in February 2022, and RHE has yet to fully implement this activity.

**This MTW activity requires a Hardship Policy. The Hardship Policy is attached.**

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Rockville MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**This MTW activity requires an Impact Analysis. The Impact Analysis is attached.**

**Please see the attached stepped rent schedule.**

**If a household progresses all the way through the stepped rent schedule**

They will no longer receive a subsidy

#### **1.e. - Minimum Rent (PH)**

To incentivize families to maintain employment, become accustomed to paying rent that is akin to what non-subsidized families pay, decrease program expenses, and increase self-sufficiency, RHE will increase the minimum rent from \$50 to \$130 for "workable families."

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Self-sufficiency

**This MTW activity has the following cost implications:**

Increased revenue;Decreased 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 only to a subset or subsets of assisted households
<b>This MTW activity applies to:</b> New admissions and currently assisted households
<b>An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).</b> The MTW activity applies only to selected family types
<b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b>  RHE' FY22 MTW Supplement was approved in February 2022, and RHE has yet to fully implement this activity.
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<b>No hardship were requested in the most recent fiscal year.</b>
<b>In the prior year, under this activity, Rockville MTW agency</b> Received 0 hardship requests  Approved hardship requests  Denied hardship requests  There is\are hardship requests pending.
<b>This MTW activity requires an Impact Analysis. The Impact Analysis is attached.</b>
<b>minimum rent or minimum Total Tenant Payment (TTP) -</b>  \$130

<b>1.f. - Minimum Rent (HCV)</b>
To incentivize families to maintain employment, become accustomed to paying rent that is akin to what non-subsidized families pay, decrease program expenses, and increase self-sufficiency, RHE will increase the minimum rent from \$50 to \$130 for "workable families."
<b>This MTW activity serves the following statutory objectives:</b> Cost effectiveness;Self-sufficiency
<b>This MTW activity has the following cost implications:</b> Increased revenue;Decreased expenditures
<b>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.</b> The MTW activity applies only to a subset or subsets of assisted households
<b>This MTW activity applies to:</b> New admissions and currently assisted households
<b>An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).</b>

The MTW activity applies only to selected family types

**The MTW activity applies to all tenant-based units**

**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.**

RHE' FY22 MTW Supplement was approved in February 2022, and RHE has yet to fully implement this activity.

**This MTW activity requires a Hardship Policy. The Hardship Policy is attached.**

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Rockville MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**This MTW activity requires an Impact Analysis. The Impact Analysis is attached.**

**minimum rent or minimum Total Tenant Payment (TTP) -**

\$130

**1.o. - Initial Rent Burden (HCV)**

RHE will increase the maximum family rent share, which is currently 40% of adjusted monthly income. The initial rent burden will increase not to exceed 50% of the family's monthly income. This will increase housing choices and lessen workable families' dependence on Federal subsidy.

**This MTW activity serves the following statutory objectives:**

Self-sufficiency;Housing choice

**This MTW activity has the following cost implications:**

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 only to a subset or subsets of assisted households

**This MTW activity applies to:**

New admissions and currently assisted households

**An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).**

The MTW activity applies only to selected family types

**The MTW activity applies to all tenant-based units**

**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.**

RHE' FY22 MTW Supplement was approved in February 2022, and RHE has yet to fully implement this activity.

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Rockville MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**This MTW activity requires an Impact Analysis. The Impact Analysis is attached.**

**Maximum income-based rent percentage**

60.00%

**1.v. - Alternative Income Inclusions/Exclusions (PH)**

1. RHE will eliminate the Earned Income Disregard. This will increase operational efficiencies by reducing the time it takes to administratively process the EID.

Currently, the EID allows individuals who go from not working in the previous 12 months, to working, to gradually phase in the income counted toward their rental calculation over a period of 2 years. The EID is an opportunity for clients that gain earned income, that did not previously have earned income to experience the benefit of increased income without that income increase being utilized for rent immediately; however, due to cumbersome regulations, the cost to continue offering this exclusion far outweigh the benefits. Families will benefit from an increase in income without an immediate increase in rent.

2. RHE will increase self-sufficiency opportunities by giving an allowance for money spent directly on educational expenses. RHE will exclude income for household members (both head of household and household members) that are full-time students. The income exclusion will equal the amount the student pays for educational costs (books, tuition, fees etc.).

3. \*NEW FY23 MTW Waiver\*

To further prepare RHE residents and participants for program graduation, RHE will now include lump sum and sporadic income for all household members in the rent calculation. Social security, military, and disability lump sum payments are excluded.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Self-sufficiency

**This MTW activity has the following cost implications:**

Neutral (no cost implications);Increased revenue;Decreased 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 only to a subset or subsets of assisted households

**This MTW activity applies to:**

New admissions and currently assisted households

**An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).**

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**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Rockville MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**Following inclusions or exclusions will be eliminated, modified, or added.**

1. RHE will eliminate the Earned Income Disregard.
2. RHE will exclude income for household members (both head of household and household members) that are full-time students. The income exclusion will equal the amount the student pays for educational costs (books, tuition, fees, etc.).
3. RHE will include lump sum and sporadic income for all household members in the rent calculation. Social security, military, and disability lump sum payments are excluded.

**1.w. - Alternative Income Inclusions/Exclusions (HCV)**

1. RHE will eliminate the Earned Income Disregard. This will increase operational efficiencies by reducing the time it takes to administratively process the EID.

Currently, the EID allows individuals who go from not working in the previous 12 months, to working, to gradually phase in the income counted toward their rental calculation over a period of 2 years. The EID is an opportunity for clients that gain earned income, that did not previously have earned income to experience the benefit of increased income without that income increase being utilized for rent immediately; however, due to cumbersome regulations, the cost to continue offering this exclusion far outweigh the benefits. Families will benefit from an increase in income without an immediate increase in rent.

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**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Self-sufficiency

**This MTW activity has the following cost implications:**

Neutral (no cost implications);Increased revenue;Decreased expenditures

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**The MTW activity applies to all tenant-based units**

**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.**

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**Following inclusions or exclusions will be eliminated, modified, or added.**

1. RHE will eliminate the Earned Income Disregard.
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3. RHE will include lump sum and sporadic income for all household members in the rent calculation. Social security, military, and disability lump sum payments are excluded.

**2.d. - Rent Reasonableness – Third-Party Requirement (HCV)**

RHE will remove the requirement to have a third-party perform rent reasonableness determinations on Project Based Voucher units owned, managed, or controlled by RHE. At the Department's request, RHE must obtain the services of a third-party entity to determine rent reasonableness for PHA-owned units.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness

**This MTW activity has the following cost implications:**

Decreased 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

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**In the prior year, under this activity, Rockville MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**Following will explain quality assurance method:**

RHE will ensure quality by making the new method visible, reviewing the policies used in developing the data, providing documentation, consulting with experts and users (if and when needed), and by keeping users informed about corrections and revisions. **and attached for quality assurance method**

**Following will explain rent reasonableness determination method:**

The rent reasonableness process involves utilizing the on-line search engine to identify at least 3 similar units and documenting the reasonableness of the rent compared to the similar units found. This process is the standard method RHE uses for all voucher rent reasonableness tests. The standard rent reasonableness process would not change. **and attached for rent reasonableness determination method**

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

The reduction in the frequency of recertifications provides an employment incentive for workable families to not be subject to a rent increase when their income improves due to self-sufficiency successes.

Triennial recertifications will be conducted for all "workable" families" (non-elderly and non-disabled) and all "non-workable families" (elderly and disabled). Annual recertifications will remain for non-wage-earning workable families, families claiming zero income, and families making less than the minimum rent income level.

Interim recertifications will be limited to one interim per calendar year and will be processed at the request of the household. If the interim is for a decrease in income, only income decreases of 10% or more will be processed. Interim decreases will be limited to one during a calendar year and no interim decreases during the first six months after initial occupancy. Required interim recertifications for household composition changes or landlord rent increases will not count against the limit on voluntary interim recertifications.

Family Self-Sufficiency program participants may be exempt from the limit on interim for the purposes of reporting income increases.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Self-sufficiency

**This MTW activity has the following cost implications:**

Decreased 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

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<b>This MTW activity requires a Hardship Policy. The Hardship Policy is attached.</b>
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<b>In the prior year, under this activity, Rockville MTW agency</b> Received 0 hardship requests  Approved hardship requests  Denied hardship requests  There is\are hardship requests pending.
<b>This MTW activity requires an Impact Analysis. The Impact Analysis is attached.</b>
<b>Recertification Schedule is</b> Once every three years
<b>Household may request 1 interim recertifications per year.</b>
Required interim recertifications for household composition changes or landlord rent increases will not count against the limit on voluntary interim recertifications.

<b>3.b. - Alternative Reexamination Schedule for Households (HCV)</b>
The reduction in the frequency of recertifications provides an employment incentive for workable families to not be subject to a rent increase when their income improves due to self-sufficiency successes.  Triennial recertifications will be conducted for all “workable” families” (non-elderly and non-disabled) and all “non-workable families” (elderly and disabled). Annual recertifications will remain for non-wage-earning workable families, families claiming zero income, and families making less than the minimum rent income level.  Interim recertifications will be limited to one interim per calendar year and will be processed at the request of the household. If the interim is for a decrease in income, only income decreases of 10% or more will be processed. Interim decreases will be limited to one during a calendar year and no interim decreases during the first six months after initial occupancy. Required interim recertifications for household composition changes or landlord rent increases will not count against the limit on voluntary interim recertifications.  Family Self-Sufficiency program participants may be exempt from the limit on interim for the purposes of reporting income increases.
<b>This MTW activity serves the following statutory objectives:</b> Cost effectiveness;Self-sufficiency
<b>This MTW activity has the following cost implications:</b> Decreased expenditures
<b>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.</b> The MTW activity applies to all assisted households
<b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b>  RHE' FY22 MTW Supplement was approved in February 2022, and RHE has yet to fully implement this activity.

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<b>Recertification Schedule is</b> Once every three years
<b>Household may request 1 interim recertifications per year.</b>
Required interim recertifications for household composition changes or landlord rent increases will not count against the limit on voluntary interim recertifications.

<b>3.c. - Self-Certification of Assets (PH)</b>
The asset self-certification threshold will be increased from \$5,000 to \$50,000. This will reduce the regulatory burden on both families and staff to allow a greater focus on people and not paperwork.
<b>This MTW activity serves the following statutory objectives:</b> Cost effectiveness
<b>This MTW activity has the following cost implications:</b> Decreased expenditures
<b>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.</b> The MTW activity applies to all assisted households
<b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b>  RHE' FY22 MTW Supplement was approved in February 2022, and RHE has yet to fully implement this activity.
<b>No hardship were requested in the most recent fiscal year.</b>
<b>In the prior year, under this activity, Rockville MTW agency</b> Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**The dollar threshold for the self-certification of assets is**

\$50,000.

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

Narrative. 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 asset self-certification threshold will be increased from \$5,000 to \$50,000. This will reduce the regulatory burden on both families and staff to allow a greater focus on people and not paperwork.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness

**This MTW activity has the following cost implications:**

Decreased 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

**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.**

RHE' FY22 MTW Supplement was approved in February 2022, and RHE has yet to fully implement this activity.

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Rockville MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**The dollar threshold for the self-certification of assets is**

\$50,000.

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

RHE will remove the requirement to have a third-party perform HQS inspections on Project Based Voucher units owned, managed, or controlled by RHE. Participants are able to request an interim inspection. HQS inspection standards, as stated 24 CFR 982.401, will not be altered in any way, shape, or form. At the request of HUD, RHE will obtain the services of a third-party entity to determine if RHE-owned units pass HQS.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness

**This MTW activity has the following cost implications:**

Decreased 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

**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.**

RHE' FY22 MTW Supplement was approved in February 2022, and RHE has yet to fully implement this activity.

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Rockville MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**The quality assurance method:**

**Following will explain the quality assurance method** – The quality control/assurance methodology that will be used for RHE performed HQS inspections, on RHE owned units, will be to have a third-party contractor conduct the quality control inspections on those units. The quality control inspection size will be based on the SEMAP quality control sample size requirement.

If [Upload file] options- Display 'Attached for quality assurance method'

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

RHE will increase the cap on the number of vouchers that can be project-based from 20% not to exceed 50%. This will allow RHE the flexibility to utilize the project-based voucher program to support the repositioning of public housing assets.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Self-sufficiency

**This MTW activity has the following cost implications:**

Increased revenue

**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

**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.**

RHE' FY22 MTW Supplement was approved in February 2022, and RHE has yet to fully implement this activity.

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Rockville MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**50.00% of total authorized HCV units will be authorized for project-basing.**

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

RHE will increase the cap on the percentage of project-based vouchers that can be project based in a building or project from 25% to 100%. This will allow RHE the flexibility to utilize the project-based voucher program to support the repositioning of public housing assets.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Housing choice

**This MTW activity has the following cost implications:**

Increased revenue

**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

**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.**

RHE' FY22 MTW Supplement was approved in February 2022, and RHE has yet to fully implement this activity.

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Rockville MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

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

RHE will eliminate the selection process in the award of Project Based Vouchers to properties owned by RHE that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property on site.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Housing choice

**This MTW activity has the following cost implications:**

Decreased 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

**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.**

RHE' FY22 MTW Supplement was approved in February 2022, and RHE has yet to fully implement this activity.

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Rockville MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**9.f. - Increase PBV HAP Contract Length (HCV)**

RHE will increase the length of the term of a Project Based Contract up to 50 years including extensions subject to appropriations and the end of the MTW Authorization. This will allow RHE to have an initial contract year of 15 to 20 years with renewal options.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Housing choice

**This MTW activity has the following cost implications:**

Increased revenue

**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

**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.**

RHE' FY22 MTW Supplement was approved in February 2022, and RHE has yet to fully implement this activity.

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Rockville MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

#### **9.h. - Limit Portability for PBV Units (HCV)**

RHE will waive the requirement to provide a tenant-based voucher at 12 months when requested by a Project Based Voucher household. RHE will require Project Based Voucher households to remain in place for 24 months prior to being eligible to receive an available tenant-based voucher.

#### **This MTW activity serves the following statutory objectives:**

Cost effectiveness;Housing choice

#### **This MTW activity has the following cost implications:**

Increased revenue;Decreased 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

#### **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.**

RHE' FY22 MTW Supplement was approved in February 2022, and RHE has yet to fully implement this activity.

#### **No hardship were requested in the most recent fiscal year.**

#### **In the prior year, under this activity, Rockville MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

#### **17.c. - Housing Development Programs**

RHE will utilize block grant funding to acquire, renovate, and/or build affordable units for low-income families that are not public housing units. Activities would be inclusive of, but not limited to, construction financing, gap financing, funding of reserves, and guarantees for non-public housing authority development of affordable housing. Development or investment in other affordable housing will include a variety of funding sources to include, but not limited to, project-based vouchers, Low Income Housing Tax Credits (LIHTC), federally insured loans, and state and local funding. Ownership structures are expected to vary depending on the deal structure.

#### **This MTW activity serves the following statutory objectives:**

Cost effectiveness;Housing choice

#### **This MTW activity has the following cost implications:**

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

**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.**

RHE' FY22 MTW Supplement was approved in February 2022, and RHE has yet to fully implement this activity.

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Rockville MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

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
David Scull Courts/Scattered Sites MD007000001	PH to PBV Conversion/Rehab	Gap, funding for capital repairs	105.00	105.00	12.00	22.00	71.00	0.00

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

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

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

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

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

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>
<b>E.1</b>	<p><b>Agency-Specific Waiver(s) for HUD Approval:</b></p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, Agency-Specific Waivers may be requested.</p> <p>Please see attached for Agency-Specific Waiver(s) requested this year.</p>
<b>E.2</b>	<p><b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b></p> <p>MTW Agency does not have approved Agency-Specific Waivers</p>

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

<b>Federal Fiscal Year (FFY)</b>	<b>Total Operating Subsidy Authorized Amount</b>	<b>How Much PHA Disbursed by the 9/30 Reporting Period</b>	<b>Remaining Not Yet Disbursed</b>	<b>Deadline</b>
2021	\$673,465	\$673,465	\$0	2029-09-30
2022	\$601,089	\$264,187	\$333,902	2030-09-30

<b>G.</b>	<b>MTW Statutory Requirements.</b>	
<b>G.1</b>	<b>75% Very Low Income – Local, Non-Traditional.</b> HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	<b>Income Level</b>	<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
	80%-50% Area Median Income	48
	49%-30% Area Median Income	78
	Below 30% Area Median Income	77
	Total Local, Non-Traditional Households	<b>203</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>
MTW agency established a rent reform policy to encourage employment and self-sufficiency	

<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.	2,436 # 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*	'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?
RELP One LP – Scattered Sites	5.00	37.00	11.00	0.00	0.00	0.00	53.00	General		0.00	0.00	No	0.00
219 Jay Drive B Rockville, MD 20850	0.00	1.00	0.00	0.00	0.00	0.00	1.00	General		0.00	0.00	No	0.00
Fireside Park Apts. 701 Monroe St. Rockville, MD 2050	57.00	78.00	11.00	0.00	0.00	0.00	146.00	General		0.00	0.00	No	0.00
229 CorkTree Ln. Rockville, MD 20850	0.00	1.00	0.00	0.00	0.00	0.00	1.00	General		0.00	0.00	No	0.00
343 Falls Grove Apt. B, Rockville, MD 20850	0.00	1.00	0.00	0.00	0.00	0.00	1.00	General		0.00	0.00	No	0.00
722 Garden View Way G, Rockville, MD 20850	0.00	1.00	0.00	0.00	0.00	0.00	1.00	General		0.00	0.00	No	0.00
Totals	62	119	22	0	0	0	203			0	0		

<b>G.4 Comparable Mix (by Family Size) – Local, Non-Traditional.</b>	
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.	
<b>Family Size:</b>	<b>Occupied Number of Local, Non-Traditional units by Household Size</b>
1 Person	78
2 Person	68
3 Person	30
4 Person	20
5 Person	6
6+ Person	1
Totals	<b>203</b>

<b>H.</b>	<b>Public Comment</b>
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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.

Please see attached for an additional public hearing held for Agency-Specific Waiver(s) and/or Safe Harbor Waiver(s)

<b>I.</b>	<b>Evaluations.</b>
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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 (10/01/2022), 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 identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

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

**Rockville Housing Enterprises**  
 \_\_\_\_\_  
**MTW PHA NAME**

**MD007**  
 \_\_\_\_\_  
**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).*

**Dr. James Hedrick Ph.D.**  
 \_\_\_\_\_  
**NAME OF AUTHORIZED OFFICIAL**

**Chairman**  
 \_\_\_\_\_  
**TITLE**

*James Hedrick*  
 \_\_\_\_\_  
**SIGNATURE**

10/26/2022  
 \_\_\_\_\_  
**DATE**

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

**RESOLUTION NO.: 2022-13**

**APPROVAL AND AUTHORIZATION TO SUBMIT THE ROCKVILLE HOUSING ENTERPRISES’  
FY2023 MOVING TO WORK SUPPLEMENT TO THE ANNUAL RHE PLAN  
COVERING THE PERIOD OCTOBER 1, 2022, THROUGH SEPTEMBER 30, 2023,  
TO THE UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

**WHEREAS**, Rockville Housing Enterprises’ (RHE) mission is to be an effective and innovative agency dedicated to enhancing opportunities for self-sufficiency and providing quality affordable housing for the citizens of the City of Rockville, and

**WHEREAS**, the Moving to Work (MTW) demonstration program supports Rockville Housing Enterprises’ mission and Rockville Housing Enterprises has been designated as a MTW agency, and

**WHEREAS**, Rockville Housing Enterprises has prepared its FY2023 MTW Supplement to the Annual RHE Plan covering the period October 1, 2022, through September 30, 2023, and

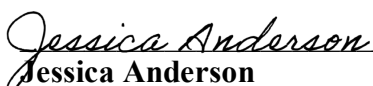
**WHEREAS**, the Rockville Housing Enterprises updated its Housing Choice Voucher Administrative Plan and Public Housing Admissions and Continued Occupancy Policy (ACOP) to reflect policy changes made in the FY2023 MTW Supplement, and

**WHEREAS**, the MTW Supplement, Administrative Plan, and ACOP were available for public comment for at least forty-five (45) days, and there were no less than fifteen (15) days between the public hearing and the approval of the MTW Supplement by the Board of Commissioners in order to incorporate any public comments into the MTW Supplement, and

**WHEREAS**, Rockville Housing Enterprises received twelve (12) public comments and three (3) public agency-specific waiver comments about the program design, and

**WHEREAS**, Rockville Housing Enterprises’ FY2023 MTW Supplement to the Annual RHE Plan is incorporated by reference into this Resolution.

**NOW, THEREFORE, BE IT RESOLVED** that the Board of Commissioners of Rockville Housing Enterprises approves and authorizes the Executive Director to submit the Rockville Housing Enterprises’ FY2023 MTW Supplement to the Annual RHE Plan to the U. S. Department of Housing and Urban Development and authorizes the Executive Director to execute all necessary agreements and to make changes that are not substantial.

  
\_\_\_\_\_  
**Jessica Anderson**  
**Executive Director**

  
\_\_\_\_\_  
**Dr. James Hedrick Ph.D.**  
**Chairman**

**October 26, 2022**  
**DATE**



## RHE ACTIVITY 17

### Landlord Incentive: Alternative Beginning Lease Term (HCV)

Core Question/Comment	Answer
<p><b>Narrative.</b> Describe the MTW activity, the MTW agency’s goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.</p>	<p>RHE is requesting this Agency-Specific Waiver (ASW) to incentivize landlords to continue leasing to their tenants, that are already in place, when they receive a Housing Choice Voucher (HCV) and other similarly situated circumstances where a lease has been executed prior to the commencement of a HAP contract. Instead of the HAP contract starting on the first day of the initial lease term, as required in the HAP contract, the term may start on the first day the unit has passed HQS inspection or the date of execution of the tenancy addendum, whichever is later. The HAP contract takes effect when the owner and tenant execute the tenancy addendum (or the latter of the tenancy addendum and the unit passing HQS). Per the OMB-approved MTW Rider to the HAP Contract form, MTW agencies may request HUD approval to waive certain requirements pertaining to the HAP contract in certain instances.</p> <p>RHE has found that some landlords are refusing to participate in the HCV program when un-assisted tenants already in the unit receive a voucher and seek to lease in place using their newly issued voucher. This is due to having to create a new lease and the time involved. This is causing undo anguish and anxiety to tenants who wish to remain in their unit. To help tenants in these situations and to incentivize landlords to participate in the HCV program, RHE is utilizing the MTW Rider to the HAP Contract form that provides the flexibility to change the terms set forth in the HAP contract. RHE proposes utilizing its MTW flexibility, through this ASW, to have the HAP contract term commence on the first day of the initial lease term OR the HAP contract term may commence on the first day the unit passes HQS inspection or the date of execution of the tenancy addendum, whichever is later. The HAP contract takes effect when the owner and tenant execute the tenancy addendum (or the latter of the tenancy addendum and the unit passing HQS). The dwelling lease, between the landlord and tenant, and the HAP Tenancy Addendum are still required. The MTW Rider states: Pursuant to the Public Housing Agency’s (PHA) participation in the MTW demonstration, the PHA may establish Section 8 HCV or PBV policies or requirements that differ from statutory requirements for both programs contained in the U.S. Housing Act of 1937, the relevant, regulatory requirements, and applicable Public and Indian Housing Notices. This ASW in no way allows for a HAP contract to be executed prior to a HQS inspection.</p> <p>Line 7. Initial Housing Assistance Payment of the Housing Assistance Payment (HAP) contract states, “The HAP contract term commences on the first day of the initial lease term.” RHE would like the term to commence either on the first day of the initial lease term, or the term may start on the first day the unit has passed HQS inspection or the date of execution of the tenancy addendum, whichever is later.</p> <p>Some of the local challenges RHE is experiencing should be mitigated by the use of this ASW, including:</p> <ul style="list-style-type: none"> <li>▪ Any situation where a client leases in place. <i>The HAP contract term commences on the first day the unit passes HQS inspection and the execution of the tenancy addendum (or the latter of the tenancy addendum and the unit passing HQS, if the unit has not yet passed HQS at the time of the tenancy addendum).</i></li> <li>▪ A client may move into a unit prior to HQS or other necessary PHA approvals due to a rental rate discount being given by the landlord for moving in early. <i>The HAP contract term commences on the first day the unit passes HQS inspection and the execution of the tenancy addendum (or the latter of the tenancy addendum and the unit passing HQS, if the unit has not yet passed HQS at the time of the tenancy addendum).</i></li> </ul>

	<ul style="list-style-type: none"> <li>▪ A client may move in prior to HQS or other necessary PHA approvals by mistake because they may have intellectual capacity issues and may not have understood the HCV process. <i>The HAP contract term commences on the first day the unit passes HQS inspection and the execution of the tenancy addendum (or the latter of the tenancy addendum and the unit passing HQS, if the unit has not yet passed HQS at the time of the tenancy addendum).</i></li> <li>▪ A client may be homeless or has some other housing emergency and must move in prior to HQS or other necessary approvals to secure the unit. <i>The HAP contract term commences on the first day the unit passes HQS inspection and the execution of the tenancy addendum (or the latter of the tenancy addendum and the unit passing HQS, if the unit has not yet passed HQS at the time of the tenancy addendum).</i></li> </ul>
<b>MTW Statutory Objectives.</b> Which of the MTW statutory objectives does this MTW activity serve?	Housing choice
<b>Cost implications.</b> What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.	Neutral
<b>Different policy by household status/family types/sites?</b> 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
<b>Household Status.</b> 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
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types
<b>Location.</b> Depending on if responses are being provided for a PH or HCV activity, the agency will either see questions applicable to PH or HCV.	<b>For HCV activities:</b> <ol style="list-style-type: none"> <li>1. The MTW activity applies to all tenant-based units</li> <li>2. The MTW activity applies to all properties with project-based vouchers</li> </ol>
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	Yes
Does this MTW activity require a hardship policy?	Yes
Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)	Yes <ol style="list-style-type: none"> <li>1. Alternative Recertification Schedule</li> <li>2. Minimum Rent</li> <li>3. Stepped Rent Graduated Total Tenant Payment</li> </ol>
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?	No
How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?	N/A
Does the MTW activity require an impact analysis?	Yes
Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)	No
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
Please provide an explanation as to why the activity was discontinued or will be discontinued.	N/A
Statute or Regulation Waived	24 CFR 982.451(a)(2) and 24 CFR 982.305(c)

## **FY23 RHE Impact Analysis Activity 1** **Alternative Recertification Schedule**

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

#### **Public Housing**

RHE processes an average of 103 public housing recertifications annually. The implementation of the alternative recertification schedule is estimated to decrease the number of annual recertification to approximately 62 each year; a decrease of 41 annual recertification actions or 60%. The estimated per action cost for public housing actions is \$689 per action. The estimated annual cost savings is estimated to be \$28,249.

#### **Housing Choice Voucher**

RHE processes an average of 552 HCV recertifications annually including portability (port-ins). The implementation of the alternative recertification schedule is estimated to decrease the number of annual recertification to approximately 223 each year; a decrease of 329 annual recertification actions or 68%. The estimated per action cost for HCV actions is \$213 per action. The estimated annual cost savings is estimated to be \$70,077.

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

The alternative recertification schedule will have a positive impact on the affordability of housing costs. Families with increases in earned income will not be obligated to report that increase for three years. A family will be able to utilize their increased income for other purposes, not just towards an increase in their tenant rent portion; the tenant rent will remain stable for a longer period of time. Also, families that experience a decrease in income or an increase in expenses more than once, in a twelve-month period, will be able to apply for a hardship exception to adjust for the loss of income. This policy has no impact on the contract rent, in which a family's tenant rent is based.

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

This waiver will not affect the waiting list.

### **4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)**

This waiver will not affect the termination rate of families. RHE has yet to terminate a family for failure to comply with the recertification process if the family submits the required documentation.

### **5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program**

This waiver will not affect the agency's current occupancy level in public housing or utilization rate in the HCV program.

### **6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice**

#### *MTW Statutory Objective - Cost Effectiveness*

This waiver will decrease the administrative costs associated with processing annual and interim recertifications

#### *MTW Statutory Objective – Self Sufficiency*

This waiver will provide incentives for families to work, decrease the incentive to voluntarily make decisions that would reduce household income, and reduce client dependence on the subsidy safety net.

### **7. Impact on the agency's ability to meet the MTW statutory requirements**

This waiver will enable RHE to meet both the statutory objectives of Cost Effectiveness and Self-Sufficiency.

### **8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity**

It is anticipated that this waiver will increase the number of hardship requests for an additional interim recertifications. Currently, there are no limits on the number of income related interim recertifications a family can request.

Under the HCV Program, an average of 327 interims are completed annually, of which 112 or 34% represent more than one interim for a family processed within a 12-month period. That data represents 47 individual families that have requested more than one interim in a 12 month period which is approximately 9% of all families processed annually. Further program data reveals the following:

- 35 families had 2 interims within a 12 month period
- 8 families had 3 interims within a 12 month period
- 2 families had 4 interims within a 12 month period
- 2 families had 5 interims within a 12 month period

Under the Public Housing Program, an average of 57 interims are completed annually, of which 26 or 46% represent more than one interim for a family processed within a 12-month period. That data represents 10 individual families that have requested more than one interim in a 12 month period which is approximately 10% of all families that are recertified annually. Further program data reveals the following:

- 7 families had 2 interims within a 12 month period
- 3 families had 4 interims within a 12 month period

Based on the data presented, it is anticipated the hardship requests will likely be requested by the small percentage of families that submit the majority of interim requests. It is anticipated that 75% of the hardship requests will be approved and 25% of the request will be denied.

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

This waiver is implemented based on income reviews, in which protected class is not a factor. Therefore, there is no anticipated impact on protected classes. Although elderly and disabled participants are a protected class, this waiver will not have a negative effect on them.

## **FY23 RHE Impact Analysis Activity 1** **Alternative Recertification Schedule**

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

#### **Public Housing**

RHE processes an average of 103 public housing recertifications annually. The implementation of the alternative recertification schedule is estimated to decrease the number of annual recertification to approximately 62 each year; a decrease of 41 annual recertification actions or 60%. The estimated per action cost for public housing actions is \$689 per action. The estimated annual cost savings is estimated to be \$28,249.

#### **Housing Choice Voucher**

RHE processes an average of 552 HCV recertifications annually including portability (port-ins). The implementation of the alternative recertification schedule is estimated to decrease the number of annual recertification to approximately 223 each year; a decrease of 329 annual recertification actions or 68%. The estimated per action cost for HCV actions is \$213 per action. The estimated annual cost savings is estimated to be \$70,077.

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

The alternative recertification schedule will have a positive impact on the affordability of housing costs. Families with increases in earned income will not be obligated to report that increase for three years. A family will be able to utilize their increased income for other purposes, not just towards an increase in their tenant rent portion; the tenant rent will remain stable for a longer period of time. Also, families that experience a decrease in income or an increase in expenses more than once, in a twelve-month period, will be able to apply for a hardship exception to adjust for the loss of income. This policy has no impact on the contract rent, in which a family's tenant rent is based.

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

This waiver will not affect the waiting list.

### **4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)**

This waiver will not affect the termination rate of families. RHE has yet to terminate a family for failure to comply with the recertification process if the family submits the required documentation.

### **5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program**

This waiver will not affect the agency's current occupancy level in public housing or utilization rate in the HCV program.

### **6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice**

#### *MTW Statutory Objective - Cost Effectiveness*

This waiver will decrease the administrative costs associated with processing annual and interim recertifications

#### *MTW Statutory Objective – Self Sufficiency*

This waiver will provide incentives for families to work, decrease the incentive to voluntarily make decisions that would reduce household income, and reduce client dependence on the subsidy safety net.

### **7. Impact on the agency's ability to meet the MTW statutory requirements**

This waiver will enable RHE to meet both the statutory objectives of Cost Effectiveness and Self-Sufficiency.

### **8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity**

It is anticipated that this waiver will increase the number of hardship requests for an additional interim recertifications. Currently, there are no limits on the number of income related interim recertifications a family can request.

Under the HCV Program, an average of 327 interims are completed annually, of which 112 or 34% represent more than one interim for a family processed within a 12-month period. That data represents 47 individual families that have requested more than one interim in a 12 month period which is approximately 9% of all families processed annually. Further program data reveals the following:

- 35 families had 2 interims within a 12 month period
- 8 families had 3 interims within a 12 month period
- 2 families had 4 interims within a 12 month period
- 2 families had 5 interims within a 12 month period

Under the Public Housing Program, an average of 57 interims are completed annually, of which 26 or 46% represent more than one interim for a family processed within a 12-month period. That data represents 10 individual families that have requested more than one interim in a 12 month period which is approximately 10% of all families that are recertified annually. Further program data reveals the following:

- 7 families had 2 interims within a 12 month period
- 3 families had 4 interims within a 12 month period

Based on the data presented, it is anticipated the hardship requests will likely be requested by the small percentage of families that submit the majority of interim requests. It is anticipated that 75% of the hardship requests will be approved and 25% of the request will be denied.

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

This waiver is implemented based on income reviews, in which protected class is not a factor. Therefore, there is no anticipated impact on protected classes. Although elderly and disabled participants are a protected class, this waiver will not have a negative effect on them.

## **FY23 RHE Impact Analysis Activity 4**

### **Minimum Rent**

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

**Public Housing**

There are currently approximately 20 workable families in the Public Housing Program whose income-based rent is less than the minimum rent for which the minimum rent increase will affect. It is anticipated that the increase in the minimum rent by \$80 from \$50 to \$130 will increase the amount of tenant rent collected annually by a total of \$1,600.

**Housing Choice Voucher**

There are currently approximately 45 workable families in the Voucher Program whose income-based rent is less than the minimum rent for which the minimum rent increase will affect. It is anticipated that the increase in the minimum rent by \$80 from \$50 to \$130 will increase the amount of tenant rent collected annually by a total of \$3,600.

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

**Public Housing**

Program rules dictate a family must pay the higher of the tenant-based rent or the minimum rent. Currently there are 20 public housing families that pay the minimum rent of \$50.

It is anticipated the implementation of an increased minimum rent will raise the tenant rent paid by affected families in the Public Housing Program by 160%.

**Housing Choice Voucher**

Program rules dictate a family must pay the higher of 30% of adjusted income or 10% of gross income and never less than the minimum rent. Currently there are 45 HCV families that pay the minimum rent of \$50.

It is anticipated the implementation of an increased minimum rent will raise the tenant rent paid by affected families in the HCV Program by 160%.

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

This waiver will not affect the waiting list.

**4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)**

This waiver will not affect the termination rate of families.

**5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program**

This waiver will not affect the agency's current occupancy level in public housing or utilization rate in the HCV program

**6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice**

*MTW Statutory Objective - Cost Effectiveness*

This waiver will increase the cost effectiveness of both the Public Housing and HVC Programs. The amount of tenant rent collected in the Public Housing Program will increase and the amount of HAP paid under the HCV program will decrease. These funds will be available to fund self-sufficiency activities, preserve existing affordable housing assets, and acquire new affordable housing assets.

*MTW Statutory Objective – Self Sufficiency*

This waiver will provide incentives for families to work, decrease the incentive to voluntarily make decisions that would reduce household income, and reduce client dependence on the subsidy safety net.

**7. Impact on the agency's ability to meet the MTW statutory requirements**

This waiver will enable RHE to meet both the statutory objectives of Cost Effectiveness and Self-Sufficiency.

**8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity**

It is anticipated that the rate of hardship requests will increase regarding minimum rent waivers for both the Public Housing and HCV Programs. Historically RHE has only received one request to waive the minimum rent in the last seven years. It is expected that the majority, 90%, of initial minimum rent waiver requests will be approved.

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

This waiver is implemented based on income reviews in which protected class is not a factor. Therefore, there is no anticipated impact on protected classes.

## **FY23 RHE Impact Analysis Activity 5**

### **Initial Rent Burden**

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

Approximately two percent, roughly 10 HCV families, pay more than 40% of their income towards their rent. RHE does not anticipate many families will choose this option due to the increase in tenant rent the family is likely to experience. Approximately one and one half percent, roughly seven HCV families, pay between 31% and 39% of their income towards their rent. These seven families would be best positioned to take advantage of this waiver and not experience an increase in tenant rent that is unaffordable.

This waiver will have a little impact on the Agency's financials. The majority of families that pay above 40% of their income toward rent are also have gross rents above the payment standard. Current program rules do not allow HAP to be paid for expenses above the Payment Standard; therefore, any additional increases in rent to be paid would be borne by the family.

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

This waiver may increase a family's rent burden, which may have a negative effect on housing affordability; however, this waiver is completely optional for the family.

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

The waiver will not affect the waiting list.

**4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)**

This waiver will not affect the agency's termination rate of families.

**5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program**

This waiver will not affect the agency's current occupancy level in public housing or utilization rate in the HCV program.

**6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice**

*MTW Statutory Goal – Self Sufficiency*

This waiver will increase self-sufficiency by allowing families to pay more of their income towards their housing costs which is in line with the open rental market.

*MTW Statutory Goal – Housing Choice*

This waiver will increase housing choices as families are able to choose from a broader pool of available units.

**7. Impact on the agency's ability to meet the MTW statutory requirements**

This waiver will enable RHE to meet both the statutory objectives of Housing Choice and Self-Sufficiency.

**8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity**

RHE does not anticipate this waiver will result in hardship requests as this is voluntary on the part of the HCV participant.

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

This waiver is based on client choice in which protected class is not a factor. Therefore, there is no anticipated impact on protected classes.

## **FY23 RHE Impact Analysis Activity 15** **Graduated Total Tenant Payment**

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

#### ***Public Housing Program Impact***

In analyzing the impact of a graduated Total Tenant Payment (TTP), RHE analyzed workable families in three income bands: families below 50% AMI, families between 50% and 80% AMI, and families above 80% AMI.

#### ***PH Workable Families Below 50% AMI***

Approximately 66% or 51 workable families have incomes below 50% of the AMI. The average monthly tenant rent for these families is \$277. A 5% increase in the TTP will result in an average increase of \$3 a month in the tenant rent for the first 5 years. Between years 5 and 6, the tenant rent will increase an average of \$15 a month. In years 7 – 10, the average monthly tenant rent increase is estimated to be \$3. The estimated aggregate increase in tenant rent collected from workable families below 50% of the AMI over the 10-year period is \$373.

#### ***PH Workable Families Between 50% and 80% AMI***

Approximately 24% or 19 workable families have incomes between 50% and 80% of the AMI. The average monthly tenant rent for these families is \$900. A 5% increase in the TTP will result in an average increase of \$2 a month in the tenant rent for the first 5 years. Between years 5 and 6, the tenant rent will increase an average of \$5 a month. In years 7 – 10, the average monthly tenant rent increase is estimated to be \$13. The estimated aggregate increase in tenant rent collected from workable families between 50% and 80% AMI over the 10-year period is \$1,478.

#### ***PH Workable Families Above 80% AMI***

Approximately 10% or 8 workable families have incomes above 80% of the AMI. The average monthly tenant rent for these families is \$1,560. A 5% increase in the TTP will result in an average increase of \$4 a month in the tenant rent for the first 5 years. Between years 5 and 6, the tenant rent will increase an average of \$9 a month. In years 7 - 10, the average monthly tenant rent increase is estimated to be \$23. The estimated aggregate increase in tenant rent collected from workable families above 80% of the AMI over the 10-year period is \$2,562.

The overall combined projected increase in tenant rent collected from all workable families over the 10-year period is \$4,413.

#### ***Housing Choice Voucher Program Impact***

In analyzing the impact of a graduated Total Tenant Payment (TTP), RHE analyzed workable families in two income bands: families below 50% AMI and families above 80% AMI. There were not a significant number of families between 50% and 80% of the AMI; therefore, those few families were absorbed into the other income categories for this data analysis.

#### ***HCV Workable Families Below 50% AMI***

Approximately 74% or 57 workable families have incomes below 50% of the AMI. The average monthly tenant rent for these families is \$313. A 5% increase in the TTP will result in an average increase of \$1 a month in the tenant rent for the first 5 years. Between years 5 and 6, the tenant rent will increase an average of \$2 a month. In years 7 – 10, the average monthly tenant rent increase is estimated to be \$5. The estimated aggregate increase in tenant rent paid by workable families below 50% of the AMI over the 10-year period is \$514.

#### ***HCV Workable Families Above 80% AMI***

Approximately 26% or 20 workable families have incomes above 80% of the AMI. The average monthly tenant rent for these families is \$1,392. A 5% increase in the TTP will result in an average increase of \$4 a month in the tenant rent for the first 5 years. Between years 5 and 6, the tenant rent will increase an average of \$7 a month. In years 7 -10, the average monthly tenant rent increase is estimated to be \$21. The estimated aggregate increase in tenant rent paid by workable families above 80% of the AMI over the 10-year period is \$2,286.

The overall combined projected increase in tenant rent paid by all workable families over the 10 year period is \$2,800. It is estimated the HAP costs will decrease by \$2,800.

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

This waiver will have a minimal impact on a family's ability to afford their housing costs. The increase in tenant rent is minimal resulting in an annual increase of less than \$5 for the first 5 years.

- 3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)**  
The waiver will not affect waiting list.
- 4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)**  
This waiver will not affect the agency's termination rate of families.
- 5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program**  
This waiver will not affect the agency's current occupancy level in public housing or utilization rate in the HCV program.
- 6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice**  
*MTW Statutory Goal - Cost Effectiveness*  
This waiver will increase the amount of available funds to support self-sufficiency activities, preserve existing affordable housing assets, and acquire new affordable housing assets by \$7,213 over a ten year period.  
  
*MTW Statutory Goal – Self Sufficiency*  
This waiver will create an environment that is comparable to that of market rate rentals, wherein tenants are subject to annual rent increases regardless of their income status.
- 7. Impact on the agency's ability to meet the MTW statutory requirements**  
This waiver will enable RHE to meet both the statutory objectives of Cost Effectiveness and Self-Sufficiency.
- 8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity**  
RHE anticipates this waiver will increase the rate of hardship requests. The number of requests granted will likely increase as well.
- 9. Across the other factors above, the impact on protected classes (and any associated disparate impact)**  
This waiver is based on income reviews in which protected class is not a factor. Therefore, there is no anticipated impact on protected classes.

**ROCKVILLE HOUSING ENTERPRISES**  
**Public Housing & HCV**  
**Graduated Total Tenant Payment Schedule**  
**(Stepped Rent)**

<b>Residency Year</b>	<b>Able-Bodied Households (Triennial Recertifications)</b>	<b>Able-Bodied Households with Zero Income &amp; making less than the Minimum Rent Income Level (Annual Recertifications)</b>
<b>Year 1</b>	The total tenant payment (TTP) will escalate by the greater of the increase in TTP based on the growth in household income or 10%.	The total tenant payment (TTP) will escalate by the greater of the increase in TTP based on the growth in household income or 5%.
<b>Year 2</b>		The total tenant payment (TTP) will escalate by the greater of the increase in TTP based on the growth in household income or 5%.
<b>Year 3</b>		The total tenant payment (TTP) will escalate by the greater of the increase in TTP based on the growth in household income or 5%.
<b>Year 4</b>	The total tenant payment (TTP) will escalate by the greater of the increase in TTP based on the growth in household income or 10%.	The total tenant payment (TTP) will escalate by the greater of the increase in TTP based on the growth in household income or 5%.
<b>Year 5</b>		The total tenant payment (TTP) will escalate by the greater of the increase in TTP based on the growth in household income or 5%.
<b>Year 6</b>		The total tenant payment (TTP) will escalate by the greater of the increase in TTP based on the growth in household income or 5%.
<b>Year 7</b>	The total tenant payment (TTP) will escalate by the greater of the increase in TTP based on the growth in household income or 10%.	The total tenant payment (TTP) will escalate by the greater of the increase in TTP based on the growth in household income or 5%.
<b>Year 8</b>		The total tenant payment (TTP) will escalate by the greater of the increase in TTP based on the growth in household income or 5%.
<b>Year 9</b>		The total tenant payment (TTP) will escalate by the greater of the increase in TTP based on the growth in household income or 5%.
<b>Year 10</b>	The total tenant payment (TTP) will escalate by the greater of the increase in TTP based on the growth in household income or 10%.	The total tenant payment (TTP) will escalate by the greater of the increase in TTP based on the growth in household income or 5%.

## Rockville Housing Enterprises

### PH Units - David Scull Scattered Site

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David Scull - Public Housing	
1200 First Street	Rockville, MD 20850
1202 First Street	Rockville, MD 20850
1204 First Street	Rockville, MD 20850
1206 First Street	Rockville, MD 20850
1208 First Street	Rockville, MD 20850
1210 First Street	Rockville, MD 20850
1212 First Street	Rockville, MD 20850
1214 First Street	Rockville, MD 20850
1216 First Street	Rockville, MD 20850
1218 First Street	Rockville, MD 20850
1220 First Street	Rockville, MD 20850
1222 First Street	Rockville, MD 20850
1224 First Street	Rockville, MD 20850
1226 First Street	Rockville, MD 20850
1228 First Street	Rockville, MD 20850
1230 First Street	Rockville, MD 20850
1232 First Street	Rockville, MD 20850
1234 First Street	Rockville, MD 20850
1236 First Street	Rockville, MD 20850
1238 First Street	Rockville, MD 20850
1240 First Street	Rockville, MD 20850
1242 First Street	Rockville, MD 20850
1244 First Street	Rockville, MD 20850
1246 First Street	Rockville, MD 20850
1248 First Street	Rockville, MD 20850
1250 First Street	Rockville, MD 20850
1252 First Street	Rockville, MD 20850
1254 First Street	Rockville, MD 20850
1256 First Street	Rockville, MD 20850
1258 First Street	Rockville, MD 20850
1260 First Street	Rockville, MD 20850
1262 First Street	Rockville, MD 20850
1264 First Street	Rockville, MD 20850
1266 First Street	Rockville, MD 20850
1268 First Street	Rockville, MD 20850
1270 First Street	Rockville, MD 20850
1272 First Street	Rockville, MD 20850
1274 First Street	Rockville, MD 20850
1276 First Street	Rockville, MD 20850
1278 First Street	Rockville, MD 20850
1280 First Street	Rockville, MD 20850
1282 First Street	Rockville, MD 20850
1284 First Street	Rockville, MD 20850
1286 First Street	Rockville, MD 20850
1288 First Street	Rockville, MD 20850
1290 First Street	Rockville, MD 20850
1292 First Street	Rockville, MD 20850

## Rockville Housing Enterprises

### PH Units - David Scull Scattered Site

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1294 First Street	Rockville, MD 20850
1296 First Street	Rockville, MD 20850
1298 First Street	Rockville, MD 20850
1300 First Street	Rockville, MD 20850
1302 First Street	Rockville, MD 20850
1304 First Street	Rockville, MD 20850
1306 First Street	Rockville, MD 20850
1308 First Street	Rockville, MD 20850
1310 First Street	Rockville, MD 20850
1312 First Street	Rockville, MD 20850
1314 First Street	Rockville, MD 20850
1316 First Street	Rockville, MD 20850
1318 First Street	Rockville, MD 20850
1320 First Street	Rockville, MD 20850
1322 First Street	Rockville, MD 20850
1301 First Street	Rockville, MD 20850
1303 First Street	Rockville, MD 20850
1305 First Street	Rockville, MD 20850
1307 First Street	Rockville, MD 20850
1309 First Street	Rockville, MD 20850
1311 First Street	Rockville, MD 20850
1313 First Street	Rockville, MD 20850
1315 First Street	Rockville, MD 20850
1317 First Street	Rockville, MD 20850
1319 First Street	Rockville, MD 20850
1321 First Street	Rockville, MD 20850
1323 First Street	Rockville, MD 20850
1325 First Street	Rockville, MD 20850
1327 First Street	Rockville, MD 20850
<b>Public Housing Scattered Sites</b>	
202 Horners Ln	Rockville, MD 20850
506 Crabb Ave	Rockville, MD 20850
609 Crabb Ave	Rockville, MD 20850
328 Lincoln Ave	Rockville, MD 20850
339 Howard Ave	Rockville, MD 20850
501 Pinewood Rd	Rockville, MD 20850
512 Pinewood Rd	Rockville, MD 20850
512 Woodston Rd	Rockville, MD 20850
618 Burgundy Dr	Rockville, MD 20850
608 Longwood Dr	Rockville, MD 20850
726 Grandin Ave	Rockville, MD 20850
615 N. Stonestreet Ave	Rockville, MD 20850
914 N. Stonestreet Ave	Rockville, MD 20850
330 Beall Ave	Rockville, MD 20850
205 N. Van Buren St	Rockville, MD 20850
226 N. Van Buren St	Rockville, MD 20850
507 Bickford Ave	Rockville, MD 20850

## Rockville Housing Enterprises

### PH Units - David Scull Scattered Site

509 Bickford Ave	Rockville, MD 20850
102 North St	Rockville, MD 20850
609 W. Lynfield Dr	Rockville, MD 20850
1309 Gladstone Dr	Rockville, MD 20851
1807 McAuliffe Dr	Rockville, MD 20851
1633 Lewis Ave	Rockville, MD 20851
1305 Clagett Dr	Rockville, MD 20851
1208 Parrish Dr	Rockville, MD 20851
1211 Highwood Rd	Rockville, MD 20851
1106 Broadwood Dr	Rockville, MD 20851
1620 Burris Rd	Rockville, MD 20851
13303 Midway Ave	Rockville, MD 20851

# **ROCKVILLE HOUSING ENTERPRISES HARDSHIP POLICY**

RHE has established a hardship policy to evaluate individual circumstances to address hardship exemption requests.

## **Applicable Family Situations**

Qualifying hardships include the following:

1. The family has experienced a decrease in income because of changed circumstances including,
  - a. Involuntary loss or reduction of employment
  - b. Death in the family
  - c. Involuntary reduction in or loss of earnings or other assistance
2. The family has experienced an increase in expenses because of changed circumstances, for
  - a. Medical costs that exceed 25% or more of the family's current expense
  - b. Childcare costs that exceed 25% or more of the family's current expense
  - c. Involuntary loss of transportation, such as a serious car accident
  - d. Education
  - e. Similar items
  - f. Such other situations and factors determined by RHE to be appropriate.

## **Process for Agency Review and Determination**

When a client requests a hardship exemption from an MTW activity RHE will take the following actions:

1. Suspend the MTW activity beginning the next month after the request until the agency has determined if the request is warranted.
2. Determine whether a hardship exists within a reasonable time after the family request and whether it is temporary or long term.
3. RHE will not evict the family during the 90-day period beginning the month following the family's request for a hardship exemption.
4. If it is determined that a financial or other hardship exists and is **TEMPORARY**, RHE will continue providing an exemption from the MTW activity at a reasonable level for up to 90 days. After that time, RHE will reinstate the MTW activity from the beginning of the suspension. RHE will offer the family a reasonable repayment agreement, on terms and conditions established by RHE for the amount of back rent owed by the family.
5. If it is determined that a financial or other hardship exists and is **LONG-TERM**, RHE will continue providing an exemption from the MTW activity at a reasonable level for a specified duration determined by RHE. After that time, RHE will reinstate the MTW activity from the beginning of the suspension. RHE will offer the family a reasonable repayment agreement on terms and conditions established by RHE for the amount of back rent owed by the family.
6. If it is determined that a financial or other hardship request did not meet hardship standards, the client must resume the MTW activity and collect any retroactive rent, if applicable, through a reasonable repayment agreement.

## **Resident Notification**

RHE will notify families of its Hardship Policy through its Administrative Plan, Admissions and Continued Occupancy Policy (ACOP), at intake, at recertification, and when a family is to be terminated due to an MTW activity.

## **Grievance Procedure**

If a family's hardship request is denied, the family is permitted to go before the Hearing Officer for a second review.

## **Reasonable Accommodations**

RHE will address persons with handicaps requesting a reasonable accommodation under 24 CFR part 8 through RHE' Reasonable Accommodations Policy and procedures.

## **Record Keeping**

RHE will keep clear records for hardship requests and determinations for three (3) years. These records are available for public review and inspection at RHE' principal office during normal business hours and supplied to HUD if requested.

Rockville Housing Enterprises

**PUBLIC NOTICE**

MTW Supplement Annual Plan FY2023

Rockville Housing Enterprises (RHE) is providing a forty-five (45) day notice to residents and the public for RHE's proposed MTW Supplement Annual Plan FY2023.

Copies of the MTW Supplement Annual Plan FY 2023 can be viewed at RHE office exterior lobby located at 1300 Piccard Dr. Suite 203 Rockville, MD 20850 during the hours of 9:30 am and 4:00 pm. and on the RHE Website [www.rockvillehe.org](http://www.rockvillehe.org) starting August 15, 2022.

A public hearing will be held on the plan on Wednesday, October 5, 2022

Please email any written comments by 5:00 p.m. on October 19, 2022.

Please submit comments to:

[tdyson@rockvillehe.org](mailto:tdyson@rockvillehe.org)

**Rockville Housing Enterprises  
FY2023 Annual Plan MTW Supplement  
RHE Resident Advisory Board Meeting**

**Date:** September 20, 2022

**Via:** Zoom

**Attendees:**

Torlynn [REDACTED]

Evelyn [REDACTED]

Aaliyah [REDACTED]

Janice [REDACTED]

Bakisha [REDACTED]

The RHE Resident Advisory Board was given a copy of RHE' FY23 Annual Plan and the FY23 MTW Supplement to the Annual Plan.

**There were no comments.**

**Rockville Housing Enterprises  
FY2023 Annual Plan MTW Supplement  
Public Comment Period**

**Additional Comments Received**

The following additional comments were received by RHE Board Members regarding the proposed MTW Supplement submission:

Commissioner Duffy: I don't agree with the term limits. The rents in Rockville are too high. Let revisit this at a later date.

Commissioner Marr: I agree with Commissioner Duffy. I don't like term limits.

Commissioner Kaplowitz: What about the families on the waiting list who never get served?

RHE Board decided not to move forward with implementing program term limits. This waiver will not be submitted.