

PHA Name : Rockville

PHA Code : MD007

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 10/1/2023

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 1956 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).

1. Tenant Rent Policies	
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
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Plan to Implement in the Submission Year
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing
3. Reexaminations	
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
4. Landlord Leasing Incentives	
5. Housing Quality Standards (HQS)	
c. Third-Party Requirement (HCV)	Currently Implementing
6. Short-Term Assistance	
7. Term-Limited Assistance	
8. Increase Elderly Age (PH & HCV)	
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Currently Implementing
b. Increase PBV Project Cap (HCV)	Not Currently Implemented
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
h. Limit Portability for PBV Units (HCV)	Currently Implementing
10. Family Self-Sufficiency Program with MTW Flexibility	
e.PH Policies for Addressing Increases in Family Income (PH)	Plan to Implement in the Submission Year
e.HCV Policies for Addressing Increases in Family Income (HCV)	Plan to Implement in the Submission Year
11. MTW Self-Sufficiency Program	
12. Work Requirement	
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
14. Moving on Policy	
15. Acquisition without Prior HUD Approval (PH)	
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	

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

1.c. - Stepped Rent (PH)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative
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.

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

Cost effectiveness; Self-sufficiency

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

Increased revenue; Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

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

This activity will be implemented in 2023 beginning with the annual reexaminations for zero income workable families on TANF and will be implemented with the triennial recerts due in 2025 for all other workable families on the triennial recert schedule.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

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

Yes

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

1.e. - Minimum Rent (PH); 1.f. - Minimum Rent (HCV); 2.b. - Payment Standards- Fair Market Rents (HCV); 3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)

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

Yes
What considerations led the MTW agency to modify the hardship policy? RHE modified its hardship policy to include repayment agreements. The terms of repayment agreements in conjunction with the hardship policy, were not explicitly defined so RHE made them more definite.
How many hardship requests have been received associated with this activity in the past year? No hardship were requested in the most recent fiscal year.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
Does the MTW activity require an impact analysis? Yes This document is attached.
Does the impact analysis apply to more than this MTW activity? No
Describe how the stepped rent is structured, including the following: how each household's rent will be set in the first year; how frequently rents will change and by what amount; and how the stepped rent will end (i.e., what is the maximum rent).
Please upload a document that presents the stepped rent schedule in the form of a table. This document is attached.
If a household progresses all the way through the stepped rent schedule, what will their status be? They will no longer receive a subsidy

1.d. - Stepped Rent (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative 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 recertification schedules and 10% for families with triennial recertification schedules.
Which of the MTW statutory objectives does this MTW activity serve? Cost effectiveness; Self-sufficiency
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Increased revenue; Decreased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

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

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.

This activity will be implemented in 2023 beginning with the annual reexaminations for zero income workable families on TANF and will be implemented with the triennial recerts due in 2025 for all other workable families on the triennial recert schedule.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Provided Already

Describe how the stepped rent is structured, including the following: how each household's rent will be set in the first year; how frequently rents will change and by what amount; and how the stepped rent will end (i.e., what is the maximum rent).

Already provided.

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

No document is attached.

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

They will no longer receive a subsidy

1.e. - Minimum Rent (PH)

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

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.”

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

Cost effectiveness; Self-sufficiency

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

Increased revenue; Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

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

The implementation of the minimum rent has not caused a disparate impact on workable families.

PH: The additional revenue, received by RHE, has allowed RHE to allocate more funding into resident services.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

No

How much is the minimum rent or minimum Total Tenant Payment (TTP)?

\$130.00

1.f. - Minimum Rent (HCV)

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

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."

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

Cost effectiveness; Self-sufficiency

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

Increased revenue; Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

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

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.

The implementation of the minimum rent has not caused a disparate impact on workable families.

HCV: The decrease in HAP payments, made by RHE, has allowed RHE to increase the payment standard for HCV participants without additional strain on the fiscal year budget.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Provided Already

How much is the minimum rent or minimum Total Tenant Payment (TTP)?

\$130.00

1.o. - Initial Rent Burden (HCV)

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

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 60% of the family's monthly income. This will increase housing choices and lessen workable families' dependence on Federal subsidy.

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

Cost effectiveness; Self-sufficiency

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

Neutral (no cost implications)

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

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

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New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

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

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.

This activity has increased housing choices, making housing options more readily available for participants. This is incredibly valuable, particularly, since landlords have increased rents in the Rockville area.

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

No

If the MTW agency plans to implement a new maximum income-based rent percentage (higher than 40% of adjusted monthly income), what is that maximum?

60.00%

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

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

Activity 1

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.).

Activity 2

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 outweighs the benefits. Families will benefit from an increase in income without an immediate increase in rent.

Activity 3

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.

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

Cost effectiveness; Self-sufficiency

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

Increased revenue; Decreased expenditures

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

The MTW activity applies to all assisted households

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

Activity 1

Since the implementation of this activity, there have only been three families in which this activity has applied. Currently, it is still too early to give more quantifiable results.

Activity 1

Eliminating EID has reduced the administrative burden of RHE.

Activity 3

RHE' FY23 MTW Supplement was approved in June 2023, and RHE has yet to fully implement this activity.

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

No

What inclusions or exclusions will be eliminated, modified, or added?

1. Modify Income Exclusion for Full-Time Students
2. Eliminate Earned Income Disregard
3. Lump Sum & Sporadic Income Inclusion

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

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

Activity 1

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.).

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Activity 3

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.

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

Cost effectiveness; Self-sufficiency

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

Increased revenue; Decreased expenditures

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

The MTW activity applies to all assisted households

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

Activity 1

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Activity 3

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

No

What inclusions or exclusions will be eliminated, modified, or added?

1. Modify Income Exclusion for Full-Time Students
2. Eliminate Earned Income Disregard
3. Lump Sum & Sporadic Income Inclusion

2.a. - Payment Standards- Small Area Fair Market Rents (HCV)

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

RHE is raising the Small Area Fair Market Rents (SAFMR) to 150% for tenant-based voucher families living in the following zip codes: 20850, 20851, 20852, 20853, 20854, and 20855. These families are experiencing extremely high rental increases, in which the family is paying over 50% of their adjusted income.

The current RHE payment standard is 100% of the FMR. A payment standard of 150% of SAFMR will increase the payment standard by an overall average of \$1,209 for all bedroom sizes across all zip codes.

Currently, there are 88 families affected by excessive rent increases, of which this activity would apply. Although the rents are high; they are considered "reasonable" for the Washington/Arlington/Alexandria, DC-VA-MD Metro area. These families are paying, on average, 42% of their adjusted income towards rent. This circumstance, unintentionally, places limits on the self-sufficiency strides of these families. This waiver would alleviate that.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

No

Please explain the payment standards by ZIP code or "grouped" ZIP codes:

Zip Code 20850

Bedroom

Size Current FMR Current PS 150% FMR-PS

0 \$2,030 \$2,030 \$3,045

1 \$2,070 \$2,070 \$3,105

2 \$2,350 \$2,350 \$3,525

3 \$2,940 \$2,940 \$4,410

4 \$3,510 \$3,510 \$5,265

Zip Code 20851

Bedroom

Size Current FMR Current PS 150% FMR-PS

0 \$1,630 \$1,630 \$2,445

1 \$1,660 \$1,660 \$2,490

2 \$1,890 \$1,890 \$2,835

3 \$2,360 \$2,360 \$3,540

4 \$2,820 \$2,820 \$4,230

Zip Code 20852

Bedroom

Size Current FMR Current PS 150% FMR-PS

0 \$1,980 \$1,980 \$2,970

1 \$2,010 \$2,010 \$3,015

2 \$2,290 \$2,290 \$3,435

3 \$2,860 \$2,860 \$4,290

4 \$3,420 \$3,420 \$5,130

Zip Code 20853

Bedroom

Size Current FMR Current PS 150% FMR-PS

0 \$1,550 \$1,550 \$2,325

1 \$1,570 \$1,570 \$2,355

2 \$1,790 \$1,790 \$2,685

3 \$2,240 \$2,240 \$3,360

4 \$2,670 \$2,670 \$4,005

Zip Code 20854

Bedroom

Size Current FMR Current PS 150% FMR-PS

0 \$2,390 \$2,390 \$3,585

1 \$2,430 \$2,430 \$3,645

2 \$2,760 \$2,760 \$4,140

3 \$3,450 \$3,450 \$5,175

4 \$4,120 \$4,120 \$6,180

Zip Code 20855

Bedroom

Size Current FMR Current PS 150% FMR-PS

0 \$1,850 \$1,850 \$2,775

1 \$1,880 \$1,880 \$2,820

2 \$2,140 \$2,140 \$3,210

3 \$2,680 \$2,680 \$4,020

4 \$3,190 \$3,190 \$4,785

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

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

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.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

RHE just converted its PH to PBVs in 2022, so this waiver has made the lease up process much easier for RHE staff, as RHE did not have to procure a third-party company to complete the rent reasonableness process. In the past, it had been difficult to find a contractor willing to make rent reasonableness determinations on only 29 units.

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

No

Please explain or upload a description of the 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.

No document is attached.

Please explain or upload a description of the 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.

No document is attached.

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

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

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.

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

Cost effectiveness; Self-sufficiency

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

RHE just implemented this activity in 2023. RHE will, most

probably, not start seeing results until the beginning of the next triennial cycle.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

No

What is the recertification schedule?

Once every three years

How many interim recertifications per year may a household request?

1

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

Required interim recertifications for household composition changes or landlord rent increases will not count against the limit on voluntary interim recertifications.

3.b. - Alternative Reexamination Schedule for Households (HCV)

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

The 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.

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

Cost effectiveness; Self-sufficiency

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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RHE just implemented this activity in 2023. RHE will, most probably, not start seeing results until the beginning of the next triennial cycle.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Provided Already

What is the recertification schedule?

Once every three years

How many interim recertifications per year may a household request?

1

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

Required interim recertifications for household composition changes or landlord rent increases will not count against the limit on voluntary interim recertifications.

3.c. - Self-Certification of Assets (PH)

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

The 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.

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

This activity has reduced RHE' administrative burden, as it has made document gathering easier. Since there are less documents to acquire and review, recerts are concluded much quicker than previously.

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

No

Please state the dollar threshold for the self-certification of assets.

\$50,000.

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

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

The 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.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

This activity has reduced RHE' administrative burden, as it has made document gathering easier. Since there are less

documents to acquire and review, recerts are concluded much quicker than previously.

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

No

Please state the dollar threshold for the self-certification of assets.

\$50,000.

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

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

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 thirdparty entity to determine if RHE-owned units pass HQS.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

RHE just converted its PH to PBVs in 2022, so this waiver has made the lease up process much easier for RHE staff, as RHE did not have to procure a third-party company to complete voucher inspections for RHE' PBV converted units. In the past, it had been difficult to find a contractor willing to perform inspections on only 29 units.

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

No

Please explain or upload the description of 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.

No document is attached.

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

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW

activity contributes to a larger initiative

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.

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

Cost effectiveness; Housing choice

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

Increased revenue

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

The MTW activity applies to all assisted households

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

RHE has not yet reached the old program cap of 20%, but RHE will exceed the 20% when RHE converts the last 76 PH units to PBVs at the end of this calendar year.

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

No

What percentage of total authorized HCV units will be authorized for project-basing?

50.00%

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

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

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.

RHE will conduct a subsidy layering review and complete site selection requirements. HQS inspections will be performed by an independent entity according to 24 CFR983.59(b) or 24 CFR983.103(f). RHE will follow Notice PIH 2013-27 where applicable, or its successor, and the property will be owned by a single-asset entity of RHE, as dictated through Notice PIH 2017-21.

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

Cost effectiveness; Self-sufficiency

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

RHE purchased a new development in December 2022 of 121 units and was able to apply 30 PBVs to the property. This waiver helped RHE to provide affordability to this property to add new affordable units, thereby increasing housing choices for participants.

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

No

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

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

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.

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

Cost effectiveness; Self-sufficiency

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

Increased revenue

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

The MTW activity applies 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 purchased a new development in December 2022 of 121 units and was able to apply 30 PBVs to the property and secured a longer affordability term of a 20-year PBV contract instead of a 15-year PBV contract. This waiver helped RHE to provide affordability to this property to add new affordable units, thereby increasing housing choices for participants.

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

No

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

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

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. Participants are able to request a tenant-based voucher for reasonable accommodations.

The family may terminate the assisted lease at any time after 24 months of occupancy. The family must give the owner advance written notice of intent to vacate (with a copy to the PHA) in accordance with the lease. If the family has elected to terminate the lease in this manner, RHE must offer the family the opportunity for continued tenant-based rental assistance, in the form of either assistance under the voucher program or other comparable tenant-based rental assistance. Before providing notice to terminate the lease, a family must contact RHE to request comparable tenant-based rental assistance if the family wishes to move with continued assistance. If voucher or other comparable tenant-based rental assistance is not

immediately available upon termination of the family's lease of a PBV unit, RHE must give the family priority to receive the next available opportunity for continued tenant-based rental assistance.

The above policies do not apply when the family or a member of the family is or has been the victim of domestic violence, dating violence, sexual assault, or stalking, as provided in 24 CFR part 5, subpart L, and the move is needed to protect the health or safety of the family or family member, or any family member has been the victim of a sexual assault that occurred on the premises during the 90-calendar-day period preceding the family's request to move. RHE may not terminate assistance if the family, with or without prior notification to RHE, moves out of a unit in violation of the lease, if such move occurs to protect the health or safety of a family member who is or has been the victim of domestic violence, dating violence, sexual assault, or stalking and who reasonably believed he or she was threatened with imminent harm from further violence if he or she remained in the dwelling unit, or any family member has been the victim of a sexual assault that occurred on the premises during the 90-calendar-day period preceding the family's request to move. If a family breaks up as a result of an occurrence of domestic violence, dating violence, sexual assault, or stalking, as provided in 24 CFR part 5, subpart L, RHE may offer the victim the opportunity for continued tenant-based rental assistance.

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

Cost effectiveness; Housing choice

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

Increased revenue; Decreased expenditures

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

The MTW activity applies to all assisted households

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

RHE purchased a new development in December 2022 of 121 units and was able to apply 30 PBVs to the property and secured a longer affordability term of a 20-year PBV contract instead of a 15-year PBV contract. Families have not been in residence long enough to determine the effectiveness of this waiver; families have only moved in during the last five months.

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

No

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

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

RHE is altering its Family Self-Sufficiency (FSS) Program by changing the traditional FSS escrow saving model. Instead of escrowing monies from rent increases based on income increases, FSS participants will now earn escrow credits based on the completion of predetermined goals. RHE will adopt a modified escrow savings model in which FSS participants accrue escrow incentives by completing specific activities and goals that align with both participant goals and the FSS program objectives. The escrow savings model will enable participants to earn escrow credits based on the attainment of various goals of the program including but not limited to employment, education, financial literacy, homeownership, and/or transition out of subsidized housing. Quarterly, as participants achieve their goals, FSS participants will earn a quarterly escrow incentive to be placed into their escrow account. For participants that are not meeting their goals for the FSS program, they will be provided with resources and supportive services that will assist them in their goal completions. FSS participants must work towards either homeownership or program graduation in the form of unsubsidized rent. FSS participants also must maintain employment and achieve at least one financial literacy goal.

Participants have the opportunity to accrue \$1,000 annually for up to five years, for a maximum of \$5,000, based on goals completed as follows:

Homeownership/Unsubsidized Rent

- A. Escrow credits are disbursed upon the successful completion of the program to purchase a home for down payment assistance/closing costs. If the family chooses to continue to use the voucher to purchase a home, they will still be an active participant in the HCV Homeownership Program.
- B. Escrow credits are disbursed upon the successful completion of the program to purchase a home without subsidy for down payment assistance/closing costs.

Escrow credits are disbursed upon the successful completion of the program to assist with the transition off of subsidy to a private market-rate rental with the approval of a lease in the head of household's name.

- A. Earn an escrow credit upon the completion of the first-time homeownership class.
- B. Earn an escrow credit upon the completion of working with the Homeownership Coordinator all 5 years or until the COP is completed (whichever comes first).

Education

- A. Earn an escrow credit upon the completion of a GED program.
- B. Earn an escrow credit upon the completion of an associate degree.
- C. Earn an escrow credit upon the completion of a bachelor's degree.
- D. Earn an escrow credit upon the completion of a master's degree.
- E. Earn an escrow credit upon the completion of a Training /Certificate Program during the 5-year COP.

Employment

- A. Earn an escrow credit upon the completion of a new full-time employment job training (non-working households).
- B. Earn an escrow credit upon the completion of obtaining full-time employment in their chosen career field within the 5-year COP.
- C. Earn an escrow credit upon the completion of receiving a promotion, an increase in pay, or going from part-time to full-time.

Financial Literacy

- A. Earn an escrow credit upon the completion of financial coaching/classes.
- B. Earn an escrow credit upon the completion of improving their credit score annually within the 5-year COP.
- C. Earn an escrow credit upon the completion of opening and maintaining a checking and savings account for the duration of the COP.
- D. Earn an escrow credit upon the completion of increasing a savings goal by at least \$500.

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

Cost effectiveness; Self-sufficiency

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

Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

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

N/A

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

No

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

In lieu of addressing increased earnings for families participating in the FSS program, RHE will give FSS participants escrow credits based on the completion of goals set within the homeownership/unsubsidized rent, education, employment, and financial literacy parameters.

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

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

RHE is altering its Family Self-Sufficiency (FSS) Program by changing the traditional FSS escrow saving model. Instead of escrowing monies from rent increases based on income increases, FSS participants will now earn escrow credits based on the completion of predetermined goals. RHE will adopt a modified escrow savings model in which FSS participants accrue escrow incentives by completing specific activities and goals that align with both participant goals and the FSS program objectives. The escrow savings model will enable participants to earn escrow credits based on the attainment of various goals of the program including but not limited to employment, education, financial literacy, homeownership, and/or transition out of subsidized housing. Quarterly, as participants achieve their goals, FSS participants will earn a quarterly escrow incentive to be placed into their escrow account. For participants that are not meeting their goals for the FSS program, they will be provided with resources and supportive services that will assist them in their goal completions. FSS participants must work towards either homeownership or program graduation in the form of unsubsidized rent. FSS participants also must maintain employment and achieve at least one financial literacy goal.

Participants have the opportunity to accrue \$1,000 annually for up to five years, for a maximum of \$5,000, based on goals completed as follows:

Homeownership/Unsubsidized Rent

A. Escrow credits are disbursed upon the successful completion of the program to purchase a home for down payment assistance/closing costs. If the family chooses to continue to use the voucher to purchase a home, they will still be an active participant in the HCV Homeownership Program.

B. Escrow credits are disbursed upon the successful completion of the program to purchase a home without subsidy for down payment assistance/closing costs.

Escrow credits are disbursed upon the successful completion of the program to assist with the transition off of subsidy to a private market rate rental with the approval of a lease in the head of household's name.

- A. Earn an escrow credit upon the completion of the first-time homeownership class.
- B. Earn an escrow credit upon the completion of working with the Homeownership Coordinator all 5 years or until the COP is completed (whichever comes first).

Education

- A. Earn an escrow credit upon the completion of a GED program.
- B. Earn an escrow credit upon the completion of an associate degree.
- C. Earn an escrow credit upon the completion of a bachelor's degree.
- D. Earn an escrow credit upon the completion of a master's degree.
- E. Earn an escrow credit upon the completion of a Training /Certificate Program during the 5-year COP.

Employment

- A. Earn an escrow credit upon the completion of a new full-time employment job training (non-working households).
- B. Earn an escrow credit upon the completion of obtaining full-time employment in their chosen career field within the 5-year COP.
- C. Earn an escrow credit upon the completion of receiving a promotion, an increase in pay, or going from part-time to full-time.

Financial Literacy

- A. Earn an escrow credit upon the completion of financial coaching/classes.
- B. Earn an escrow credit upon the completion of improving their credit score annually within the 5-year COP.
- C. Earn an escrow credit upon the completion of opening and maintaining a checking and savings account for the duration of the COP.
- D. Earn an escrow credit upon the completion of increasing a savings goal by at least \$500.

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

Cost effectiveness; Self-sufficiency

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

Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

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

The MTW activity applies to all tenant-based units

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Provided Already

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

In lieu of addressing increased earnings for families participating in the FSS program, RHE will give FSS participants escrow credits based on the completion of goals set within the homeownership/unsubsidized rent, education, employment, and financial literacy parameters.

D.	Safe Harbor Waivers.
D.1	<p>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</p> <p>No Safe Harbor Waivers are being requested.</p>

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

Agency-Specific Waiver(s) for which HUD Approval has been Received:

Does the MTW agency have any approved Agency-Specific Waivers?

Yes

E.2

Title	Has there been a change in how the waiver is being implemented from when it was originally approved?	Please provide a description of what has changed.	Please provide a description of the final outcomes and lessons learned from implementing this Activity at your PHA.	If the MTW Agency was previously required to prepare an impact analysis, was a final impact analysis prepared at the time of discontinuation?
Landlord Incentive: Alternative Beginning Lease Term	No			
Landlord Incentive: Alternative Beginning Lease Term	No			

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2021	\$673,465	\$637,465	\$0	2029-09-30
2022	\$630,095	\$630,095	\$0	2030-09-30
2023	\$414,840	\$361,102	\$53,738	2031-09-30

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

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

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

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

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

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

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

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

I.	Evaluations.
	No known evaluations.

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

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

Repayment Agreement

Families that have entered into a repayment agreement, of any kind, with RHE must comply with the terms of the repayment agreement. Failure to comply with any provision of the repayment agreement may result in termination of tenancy and/or assistance. Late and/or missed payments constitute default of the repayment agreement and may result in termination of tenancy and/or assistance. Qualified hardships will not be extended unless the family is in compliance with the 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's 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's principal office during normal business hours and supplied to HUD if requested.

FY24 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.

FY24 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.

FY24 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.

FY24 RHE Impact Analysis Activity 18
Payment Standard – Small Area Fair Market Rents

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

RHE is raising the Small Area Fair Market Rents (SAFMR) to 150% for tenant-based voucher families living in the following zip codes: 20850, 20851, 20852, 20853, 20854, and 20855. These families are experiencing extremely high rental increases, in which the family is paying over 50% of their adjusted income.

The current RHE payment standard is 100% of the FMR. A payment standard of 150% of SAFMR will increase the payment standard by an overall average of \$1,209 for all bedroom sizes across all zip codes.

Currently, there are 88 families affected by excessive rent increases, of which this activity would apply. Although the rents are high; they are considered “reasonable” for the Washington/Arlington/Alexandria, DC-VA-MD Metro area. These families are paying, on average, 42% of their adjusted income towards rent. This circumstance, unintentionally, places limits on the self-sufficiency strides of these families. This waiver would alleviate that.

The average payment standard increase, for all bedroom sizes, by zip codes is as following:

Zip Code 20850: \$1,290
Zip Code 20851: \$1,036
Zip Code 20852: \$1,256
Zip Code 20853: \$982
Zip Code 20854: \$1,515
Zip Code 20855: \$1,174

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 make housing costs more affordable for affected families. The tenant rent portion for families is increasing due to an overall increase in market rents. By increasing the payment standard, this activity will reduce the rent burden on families.

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

The intention of this waiver is to maintain the current utilization rate in HCV.

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

MTW Statutory Goal – Housing Choice

This waiver will assist families by increasing their housing choices.

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

This waiver will enable RHE to meet the statutory objective of Housing Choice.

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

This waiver will not result in additional hardship requests.

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

This waiver does not affect any protected class and is therefore not applicable.

FY24 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 80% and 50% 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

PH Units - David Scull Scattered Site

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

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
Public Housing Scattered Sites	
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

FY 2024
Annual Plan
MTW Supplement

PUBLIC NOTICE POSTING

RHE WEBSITE &
WASHINGTON POST

POSTED ON 8-14-2023 HARD PRINT

ON LINE 8-14-2023 TO 9-13-2023

PUBLIC NOTICE

MTW Supplement Annual Plan FY2024

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 FY2024.

Copies of the MTW Supplement Annual Plan FY 2024 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 starting August 14, 2023.

A Resident Meeting on the MTW Agency Specific Waivers will be held on Tuesday, October 03, 2023 at 10:00am and 6:30 p.m.

A Public Hearing on the plan will be held on Wednesday, October 04, 2023, at 6:30 p.m.

A Resident Advisory Board will be held on Tuesday, October 03, 2023 at 12pm.

Please email any written comments by 5pm on October 15, 2023.

Please submit comments to tdyson@rockvillehe.org.

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 (10/01/2023), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

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

10/26/2023

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.: 2023-20

**APPROVAL AND AUTHORIZATION TO SUBMIT THE ROCKVILLE HOUSING ENTERPRISES’
FY2024 MOVING TO WORK SUPPLEMENT TO THE ANNUAL RHE PLAN
COVERING THE PERIOD OCTOBER 1, 2023, THROUGH SEPTEMBER 30, 2024,
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 FY2024 MTW Supplement to the Annual RHE Plan covering the period October 1, 2023, through September 30, 2024, 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 FY2024 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 a number of public comments about the program design, and

WHEREAS, Rockville Housing Enterprises’ FY2024 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’ FY2024 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

**Jessica Anderson
Executive Director**

October 20, 2023 DATE



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

