

PHA Name : Rockville

PHA Code : MD007

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 10/1/2021

PHA Program Type: Combined

MTW Cohort Number: 1

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

Rockville Housing Enterprises (RHE) is situated in Rockville, Maryland. It was established in 1959 as the City of Rockville's public housing agency to provide affordable housing opportunities. RHE administers both the Public Housing and Housing Choice Voucher (HCV) programs as well as affordable housing options to all eligible households regardless of race, color, religion, sex, physical or mental handicap, familial status, national origin, or other protected class. RHE is dedicated to being an effective and innovative agency that enhances opportunities for self-sufficiency and provides quality affordable housing for the citizens of Rockville. The vision of RHE's 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)	Plan to Implement in the Submission Year
d. Stepped Rent (HCV)	Plan to Implement in the Submission Year
e. Minimum Rent (PH)	Plan to Implement in the Submission Year
f. Minimum Rent (HCV)	Plan to Implement in the Submission Year
o. Initial Rent Burden (HCV)	Plan to Implement in the Submission Year
v. Alternative Income Inclusions/Exclusions (PH)	Plan to Implement in the Submission Year
w. Alternative Income Inclusions/Exclusions (HCV)	Plan to Implement in the Submission Year
2. Payment Standards and Rent Reasonableness	
d. Rent Reasonableness – Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Plan to Implement in the Submission Year
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
c. Self-Certification of Assets (PH)	Plan to Implement in the Submission Year
d. Self-Certification of Assets (HCV)	Plan to Implement in the Submission Year
4. Landlord Leasing Incentives	
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	
5. Housing Quality Standards (HQS)	
c. Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
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)	Plan to Implement in the Submission Year
b. Increase PBV Project Cap (HCV)	Plan to Implement in the Submission Year
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Plan to Implement in the Submission Year
f. Increase PBV HAP Contract Length (HCV)	Plan to Implement in the Submission Year
10. Family Self-Sufficiency Program with MTW Flexibility	
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. Housing Development Programs	Plan to Implement in the Submission Year

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

1.c. - Stepped Rent (PH)
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.
This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency

This MTW activity serves the following statutory objectives: Increased revenue Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types
This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
Attached Hardship policy applies to: 1.e. - Minimum Rent (PH) 1.f. - Minimum Rent (HCV) 3.a. - Alternative Reexamination Schedule for Households (PH) 3.b. - Alternative Reexamination Schedule for Households (HCV}}
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Rockville MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
Please see the attached stepped rent schedule.
If a household progresses all the way through the stepped rent schedule, They will no longer receive a subsidy

1.d. - Stepped Rent (HCV)
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.
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This MTW activity requires an Impact Analysis. The Impact Analysis is attached.

Please see the attached stepped rent schedule.

If a household progresses all the way through the stepped rent schedule
They will no longer receive a subsidy

1.e. - Minimum Rent (PH)

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

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

This MTW activity serves the following statutory objectives:
Increased revenue
Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:
New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).
The MTW activity applies only to selected family types

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

No hardship were requested in the most recent fiscal year.

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

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

minimum rent or minimum Total Tenant Payment (TTP) - \$130

1.f. - Minimum Rent (HCV)

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

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

This MTW activity serves the following statutory objectives:
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Decreased expenditures

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The MTW activity applies only to selected family types

The MTW activity applies to all tenant-based units

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

No hardship were requested in the most recent fiscal year.

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

Received 0 hardship requests
Approved hardship requests
Denied hardship requests
There is\are hardship requests pending.

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

minimum rent or minimum Total Tenant Payment (TTP) - \$130

1.o. - Initial Rent Burden (HCV)

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

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

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

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The MTW activity applies only to selected family types

The MTW activity applies to all tenant-based units

No hardship were requested in the most recent fiscal year.

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Denied hardship requests
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Maximum income-based rent percentage 60.00%

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

Activity 3 Eliminate Earned Income Disregard

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

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

Activity 6 Modify Income Exclusion for Full Time Students

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.).

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

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

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
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No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Rockville MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
Following inclusions or exclusions will be eliminated, modified, or added. Activity 3 - RHE will eliminate the Earned Income Disregard. Activity 6 -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.).

1.w. - Alternative Income Inclusions/Exclusions (HCV)
Activity 3 - Eliminate Earned Income Disregard RHE will eliminate the Earned Income Disregard. This will increase operational efficiencies by reducing the time it takes to administratively process the EID. Currently, the EID allows individuals who go from not working in the previous 12 months, to working, to gradually phase in the income counted toward their rental calculation over a period of 2 years. The EID is an opportunity for clients that gain earned income, that did not previously have earned income to experience the benefit of increased income without that income increase being utilized for rent immediately; however, due to cumbersome regulations, the cost to continue offering this exclusion far outweigh the benefits. Families will benefit from an increase in income without an immediate increase in rent. Activity 6 - Modify Income Exclusion for Full Time Students 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.).
This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency
This MTW activity serves the following statutory objectives: Neutral (no cost implications) Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
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The MTW activity applies to all tenant-based units
No hardship were requested in the most recent fiscal year.
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Following inclusions or exclusions will be eliminated, modified, or added.

Activity 3 - RHE will eliminate the Earned Income Disregard.

Activity 6 - 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.).

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

RHE will remove the requirement to have a third-party perform rent reasonableness determinations on Project Based Voucher units owned, managed, or controlled by RHE.

This MTW activity serves the following statutory objectives:
Cost effectiveness

This MTW activity serves the following statutory objectives:
Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:
New admissions and currently assisted households

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The MTW activity applies to all family types

The MTW activity applies to all tenant-based units

No hardship were requested in the most recent fiscal year.

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

Following will explain quality assurance method:
RHE will ensure quality by making the new method visible, reviewing the policies used in developing the data, providing documentation, consulting with experts and users (if and when needed), and by keeping users informed about corrections and revisions. At the Department's request, the agency must obtain the services of a third-party entity to determine rent reasonableness for PHA-owned units, and attached for quality assurance method

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

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

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

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

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

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

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

This MTW activity serves the following statutory objectives: Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
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This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Rockville MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
Recertification Schedule is Once every three years
Household may request 1 interim recertifications per year.
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)

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” (fixed income families). Annual recertifications will remain for families claiming zero income and families making less than the minimum rent income level.
Interim recertifications will be limited to one interim per calendar year and will be processed at the request of the household. If the interim is for a decrease in income, only income decreases of 10% or more will be processed. Interim decreases will be limited to one during a calendar year and no interim decreases during the first six months after initial occupancy. Required interim recertifications for household composition changes or landlord rent increases will not count against the limit on voluntary interim recertifications.
Family Self-Sufficiency program participants may be exempt from the limit on interim for the purposes of reporting income increases.
This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency
This MTW activity serves the following statutory objectives: Decreased expenditures
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This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Rockville MTW agency Received 0 hardship requests

Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
Recertification Schedule is Once every three years
Household may request 1 interim recertifications per year.
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)
The asset self-certification threshold will be increased from \$5,000 to \$50,000. This will reduce the regulatory burden on both families and staff to allow a greater focus on people and not paperwork.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
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The dollar threshold for the self-certification of assets is \$50,000.

3.d. - Self-Certification of Assets (HCV)
The asset self-certification threshold will be increased from \$5,000 to \$50,000. This will reduce the regulatory burden on both families and staff to allow a greater focus on people and not paperwork.
This MTW activity serves the following statutory objectives: Cost effectiveness
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The dollar threshold for the self-certification of assets is \$50,000.

5.c. - Third-Party Requirement (HCV)
RHE will remove the requirement to have a third-party perform HQS inspections on Project Based Voucher units owned, managed, or controlled by RHE.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
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In the prior year, under this activity, Rockville MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
The quality assurance method: Following will explain the quality assurance method – The quality control/assurance methodology that will be used for RHE performed HQS inspections, on RHE owned units, will be to have a third-party contractor conduct the quality control inspections on those units. The quality control inspection size will be based on the SEMAP quality control sample size requirement. If [Upload file] options- Display 'Attached for quality assurance method"

9.a. - Increase PBV Program Cap (HCV)
RHE will increase the cap on the number of vouchers that can be project-based from 20% not to exceed 50%. This will allow RHE the flexibility to utilize the project-based voucher program to support the repositioning of public housing assets.
This MTW activity serves the following statutory objectives: Cost effectiveness Housing choice
This MTW activity serves the following statutory objectives: Increased revenue
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other). The MTW activity applies to all family types
This MTW activity applies to the following housing choice voucher unit types: RHE will apply this activity to RHE-owned properties that are converting to project-based voucher developments through HUD's conversion programs, specifically David Scull Courts MD00700001. RHE will also make this waiver available to future affordable housing developments in which RHE may participate.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Rockville MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.

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

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

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

This MTW activity serves the following statutory objectives:
Cost effectiveness
Housing choice

This MTW activity serves the following statutory objectives:
Increased revenue

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households

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No hardship were requested in the most recent fiscal year.

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

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

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

This MTW activity serves the following statutory objectives:
Cost effectiveness
Housing choice

This MTW activity serves the following statutory objectives:
Decreased expenditures

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No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Rockville MTW agency
Received 0 hardship requests

Approved hardship requests
 Denied hardship requests
 There is\are hardship requests pending.

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

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

This MTW activity serves the following statutory objectives:
 Cost effectiveness
 Housing choice

This MTW activity serves the following statutory objectives:
 Increased revenue

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

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

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

This MTW activity serves the following statutory objectives:
 Cost effectiveness
 Housing choice

This MTW activity serves the following statutory objectives:
 Increased revenue
 Decreased expenditures

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No hardship were requested in the most recent fiscal year.

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

Received 0 hardship requests
 Approved hardship requests
 Denied hardship requests
 There is\are hardship requests pending.

17.c. - Housing Development Programs

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

This MTW activity serves the following statutory objectives:
 Cost effectiveness
 Housing choice

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

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:
 New admissions and currently assisted households

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

The MTW activity applies to all tenant-based units

No hardship were requested in the most recent fiscal year.

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

Table 17.c.1 - Housing Development Programs that the MTW Agency plans to commit Funds to in Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 60% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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Housing Development Programs that the MTW Agency plans to spend funds on in the Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 60% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 60% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
David Scull Courts/Scattered Sites MD007000001	PH to PBV Conversion/Rehab	Gap, funding for capital repairs	105	105	12	22	71	0

Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 60% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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D.	Safe Harbor Waivers.
D.1	Safe Harbor Waivers seeking HUD Approval: No Safe Harbor Waivers are being requested.

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

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	\$0	\$673,465	2029-09-30

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.
MTW agency established a rent reform policy to encourage employment and self-sufficiency	

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.

I.	Evaluations.
	No known evaluations.

ROCKVILLE HOUSING ENTERPRISES HARDSHIP POLICY

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

Applicable Family Situations

Qualifying hardships include the following:

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

Process for Agency Review and Determination

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

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

Resident Notification

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

Grievance Procedure

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

Reasonable Accommodations

RHE will address persons with handicaps requesting a reasonable accommodation under 24 CFR part 8 through RHE'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.

FY22 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.

FY22 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.

FY22 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.

Modified Escrow Saving Schedule

Education and Training Completion of:	Frequency	Incentive
Training/Certificate Program	one-time	\$300
GED	one-time	\$400
Associates Degree	one-time	\$500
Bachelor's Degree	one-time	\$800
Master's Degree	one-time	\$1000

Employment:	Frequency	Incentive
Obtain new employment	one-time	\$250
Employment retention for 12 months	One-time per year	\$500

Participation:	Frequency	Incentive
Annual face to face progress meetings	one-time per year	\$250
Successful completion of the program	one-time	\$1000

Financial Literacy:	Frequency	Incentive
Financial Coaching/Classes	one-time per year	\$250
Improve credit score	one-time	varies
Open and maintain checking and savings	one-time	\$200
Increase savings goals by at least \$500	one-time	varies

Homeownership/Unsubsidized:	Frequency	Incentive
First Time Homeownership Class	one-time	\$250
Work with Homeownership Coordinator	one-time	\$250
Purchase Home	one-time	\$2500
Transition off of subsidy	one-time	\$1500

RHE will apply the escrow credits at the time of completion for the following completions:
Completion of training/certificate program;
Completion of GED
Completion of Associates, Bachelors, or Master's Degree;
Obtaining new employment

Escrow pay points is double the amount of the number of points for credit increase in 50 points intervals. 25-point increase = \$25, 50-point increase = \$50, 75-point increase = \$75.
Employment retention for 12 consecutive months;
Attend all required face to face progress meetings;
Participate in financial literacy classes; and/or
Purchase home or transition off of subsidy

RHE will apply escrow credits upon successful completion of the program for the following escrow pay points:

Successful completion of the FSS program;

Improve credit score;

Open and maintain a checking and savings account;

Increase personal savings by at least \$50;

Participate in homeownership preparation activities; and

Transition off of subsidy.

Escrow pay points maybe applied retroactively, with the exception of those escrow pay points that are only applied upon successful completion of the program. For example: if a participant earns an bachelors degree in June, but does not have an annual face to face progress report meeting and supply the supporting documentation of completion of the goal until later in the year, the escrow accrual pay point may still be applied to the account. However, the interest on the account will not be applied retroactively.

The following chart shows the escrow pay point and verification of supporting documentation needed in order to apply the escrow credit.

Category	Goal	Amount	Frequency	Supporting Documentation
Education/ Training	Completion of training/certificate/certification program	\$300	One-time	Certificate, certification or transcript
Education/ Training	GED	\$400	One-time	Diploma or transcript
Education/ Training	Associates	\$500	One-time	Diploma or transcript
Education/ Training	Bachelors	\$800	One-time	Diploma or transcript
Education/ Training	Masters	\$1000	One-time	Diploma or transcript
Employment	Obtain New Employment	\$250	One-time	One or more of the following: --RHE Employment verification form. -Employer offer letter on company letter head
Employment	Employment Retention for 12 months	\$500	One-per year	One or more of the following: --RHE Employment verification form. -Employer offer letter on company letter head. -Self-employment tax forms
Participation	Completion of annual face to face progress meeting	\$250	One-time per year	RHE one-on-one meeting verification.
Participation	Successful completion of the FSS program	\$1000	One-time	Graduation Certificate
Financial Literacy	Participate in financial classes, coaching, and education	\$250	One-time per year	One or more of the following: -Certificate of completion -Coaching session verification

Category	Goal	Amount	Frequency	Supporting Documentation
Financial Literacy	Improve credit score	varies	One-time	Initial credit report and follow up credit report from the same 12 interval period and follow up 90 days before graduation
Financial Literacy	Open and maintain checking and savings accounts	\$200	One-time	Bank statements
Financial Literacy	Increase personal savings by \$500	varies	One-time	Bank statement
Homeownership/ Unsubsidized	First time homeownership class	\$250	One-time	Certification of completion
Homeownership/ Unsubsidized	Work with Homeownership Coordinator	\$250	One-time	Verification from Homeownership coordinator
Homeownership/ Unsubsidized	Purchase Home	\$2500	One-time	Closing Disclosure Settlement statement
Homeownership/ Unsubsidized	Transition off of subsidy	\$1500	One-time	\$0 HAP or EOP

Transition current participants/successfully completing program 2021

Participants successfully completing the FSS program in 2021 will remain on the current FSS program model and upon completion will receive escrow payout based on the calculations of the current model.

Transition current participants continuing in the FSS program after 2021 and beyond

Participants will transition to the new escrow schedule pay point model for the remainder of their contract.

Participants that accrued savings through December 2020, will remain in their accounts and upon successful completion of the program will be paid out in combination with the escrow savings accrual under the new model.

Participants that have not accrued through December 2020, will accrue a savings based on the new model for the remainder of their contract.

Transition New FSS participants

All new participants will accrue escrow through the new savings model.

All current participants will be required to sign an amendment to their current contract outlining how the new FSS escrow savings model

FY22 RHE Impact Analysis Activity 17 **Graduated Total Tenant Payment**

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

Public Housing Program Impact

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

PH Workable Families Below 50% AMI

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

PH Workable Families Between 50% and 80% AMI

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

PH Workable Families Above 80% AMI

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

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

Housing Choice Voucher Program Impact

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

HCV Workable Families Below 50% AMI

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

HCV Workable Families Above 80% AMI

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

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

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

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

- 3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)**
The waiver will not affect waiting list.
- 4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)**
This waiver will not affect the agency's termination rate of families.
- 5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program**
This waiver will not affect the agency's current occupancy level in public housing or utilization rate in the HCV program.
- 6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice**
MTW Statutory Goal - Cost Effectiveness
This waiver will increase the amount of available funds to support self-sufficiency activities, preserve existing affordable housing assets, and acquire new affordable housing assets by \$7,213 over a ten year period.

MTW Statutory Goal – Self Sufficiency
This waiver will create an environment that is comparable to that of market rate rentals, wherein tenants are subject to annual rent increases regardless of their income status.
- 7. Impact on the agency's ability to meet the MTW statutory requirements**
This waiver will enable RHE to meet both the statutory objectives of Cost Effectiveness and Self-Sufficiency.
- 8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity**
RHE anticipates this waiver will increase the rate of hardship requests. The number of requests granted will likely increase as well.
- 9. Across the other factors above, the impact on protected classes (and any associated disparate impact)**
This waiver is based on income reviews in which protected class is not a factor. Therefore, there is no anticipated impact on protected classes.

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

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%.

Annual Plan MTW Supplement / MTW Agency Specific Waiver/ Public Hearing

Meeting Registrations and Comments

Meeting Dates

October 19, 2021 - MTW Agency Specific Waiver Resident Meeting

October 20, 2021 - Annual Plan MTW Waiver Public Hearing

October 21, 2021- **Spanish Language** - Annual Plan MTW Waiver
Public Hearing MTW Agency Specific Waiver Resident Meeting

RHE Annual Plan - MTW Supplement- Agency Specific

October 19, 2021 - Resident Meeting - MTW Supplement - Agency Specific Waiver
October 20, 2021 - Annual Plan - MTW Supplement Public Hearing

October 19, 2021 - Resident Meeting - MTW Supplement - Agency Specific Waiver

Participant Comment/Question 1

When does this start?

RHE Answer 1

The new MTW policy changes will start when HUD approves the MTW

Participant Comment/Question 2

How does this affect me? (elderly participant)

RHE Answer 2

The alternative recert schedule , Earned Income Disregard, self certification of assets, elimination of flat rent wavier will apply to all residents and program participants. Including elderly and disabled clients; Graduated TTP increase, minimum rent increase, full time student income exclusion, initial rent burden increase will not affect elderly and disabled clients.

Participant Comment/Question 3

How does this affect me? (elderly participant)

RHE Answer 3

For elderly and disabled residents the only MTW waiver that will affect you is the change from annual to triennial recertifications. Additionally, only one interim recertification will be allowed in a 12 month period. That includes the reporting of an income increase. But does not include interim re-examinaitons for rent increases and household composition changes.

Participant Comment/Question 4

Will the TTP increase by 10% each year?

RHE Answer 4

The TTP increase does not apply to elderly and disabled families. For workable households with income, the TTP will increase by the higher of 10% or the TTP as calculated based on an increase in household income once every three years to be calculated at the triennial recertification. For workable households reporting zero income, the TTP will increase by the higher of 5% or the TTP based on income as calculated annually during the annual recertification that will be required for zero income workable families.

October 20, 2021 - Annual Plan Public Hearing - MTW Supplement

Participant Comment/Question 1

Do you have to submit income increase interim reexams ?

RHE Answer 1

You only have to submit an interim for an increase in income if you want to for example if you are an FSS client and want to report the increase you can.

October 21, 2021 - Annual Plan Public Hearing - MTW Supplement - Spanish Version

Participant Comment/Question 1

When is the plan going to be implemented?

RHE Answer 1

The plan will be implemented upon HUD approval RHE is not sure when that will be exactly.

Participant Comment/Question 2

If the person is retired, does it affect them?

RHE Answer 2

The alternative recert schedule , Earned Income Disregard, self certification of assets, elimination of flat rent wavers will apply to all residents and program participants. Including elderly and disabled clients; Graduated TTP increase, minimum rent increase, full time student income exclusion, initial rent burden increase will not affect elderly and disabled clients.

Participant Comment/Question 3

Will this new program require people to work?

RHE Answer 3

No, there currently is no work requirement; RHE will work with clients to help them become gainfully employed and achieve self sufficiency

Participant Comment/Question 4

How can I get this information out to people

RHE Answer 4

Everyone was sent the information for this meeting, however the presentation will be posted to the RHE website.

Participant Comment/Question 5

What does PBV and VAWA and MTW mean

RHE Answer 5

PBV stands for Project Based Voucher. VAWA stands for the Violence Against Womens Act; MTW stands for Move to Work

Participant Comment/Question 6

A family with 3 members, do they get 3 rooms? Do boys and girls have to share a room? If the mom applies for the unit with one daughter, do you give her one bedroom or 2 bedrooms? she has a grandson that spends more time with her then with his mom can she get another room for her grandson?

RHE Answer 6

RHE's occupancy standards dictate that one room is assigned to the Head and Spouse or Co-Head if the cohead is a spouse or other relationship that shares a bed. All other persons are assigned 2 persons per additional bedroom regardless of age or gender. RHE does not dictate a family's sleeping arrangement. A mom with one daughter would be assigned a 2 BR unit. If the grandmother has legal custody of the grandson, a bedroom may be assigned based on the aforementioned occupancy standards.

RHE Annual Plan - MTW Supplement- Agency Specific

General Comments Received from Public During Public Posting Period Public Hearing October 20, 2021

Comment 1 - Homeownership Plan - (Homeownership Coordinator)

it may be best for the HO program to only be open to RHE clients and not Port In clients unless they are absorbed by RHE. RHE's Payment Standard may be too high for other Agency's to support the HO payment for the long term. The income and mortgage qualification standards should also be applied for elderly and disabled families. Ultimately if the family cannot support the mortgage or

Comment 2 - Income verification methods - RHE Staff

A credit report should be run to verify potential income sources for those participants and tenants suspected of intentionally misrepresenting their income

Comment 3 - In kind income sources

Be sure the Admin and ACOP clarify that inkind income or donations is considered a form of income and will be counted as income

RESOLUTION NO.: 2021-21

**APPROVAL AND AUTHORIZATION TO SUBMIT THE ROCKVILLE HOUSING ENTERPRISES’
FY2022 MOVING TO WORK SUPPLEMENT TO THE ANNUAL RHE PLAN
COVERING THE PERIOD OCTOBER 1, 2021, THROUGH SEPTEMBER 30, 2022,
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 FY2022 MTW Supplement to the Annual RHE Plan covering the period October 1, 2021, through September 30, 2022, and

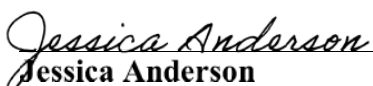
WHEREAS, the Rockville Housing Enterprises updated its Housing Choice Voucher Administrative Plan and Public Housing Admissions and Continued Occupancy Policy (ACOP) to reflect policy changes made in the FY2022 MTW Supplement, and

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

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

WHEREAS, Rockville Housing Enterprises’ FY2022 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’ FY2022 MTW Supplement to the Annual RHE Plan to the U. S. Department of Housing and Urban Development and authorizes the Executive Director to execute all necessary agreements and to make changes that are not substantial.



Jessica Anderson
Executive Director



Dr. James Hedrick Ph.D.
Chairman

November 4, 2021
DATE



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 (10/01/2021), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

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

11/4/2021

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.*