

**PHA Name : Rosenberg**

**PHA Code : TX483**

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

**PHA Program Type:** Housing Choice Voucher (HCV) only

**MTW Cohort Number:** 1

**MTW Supplement Submission Type:** Annual Submission

**B. MTW Supplement Narrative.**

The Rosenberg Housing Authority plans on using MTW during this first year to focus on reducing cost and achieving greater cost effectiveness by simplifying the rent process by reducing the amount of verification documents required at annual re-exams and determining a family's rent portion as a percentage of gross rent. Families reexams will change to either 2 or 3 years depending upon the type of income a family has coming into the household.

The housing authority will give incentives to families to gain employment and become self-sufficient by eliminating the need to report interim changes for increases of income which allows families to keep more of their income and ensure stability of the rent for those 2 years.

The housing authority will increase housing choices for low-income families by allowing a greater amount of the families income to be applied to go to rent when initially moving in.

**C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).**

<b>1. Tenant Rent Policies</b>	
f. Minimum Rent (HCV)	Plan to Implement in the Submission Year
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Plan to Implement in the Submission Year
n. Utility Reimbursements (HCV)	Plan to Implement in the Submission Year
o. Initial Rent Burden (HCV)	Plan to Implement in the Submission Year
s. Elimination of Deduction(s) (HCV)	Plan to Implement in the Submission Year
w. Alternative Income Inclusions/Exclusions (HCV)	Plan to Implement in the Submission Year
<b>2. Payment Standards and Rent Reasonableness</b>	
<b>3. Reexaminations</b>	
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
d. Self-Certification of Assets (HCV)	Not Currently Implemented
<b>4. Landlord Leasing Incentives</b>	
<b>5. Housing Quality Standards (HQS)</b>	
d. Alternative Inspection Schedule (HCV)	Plan to Implement in the Submission Year
<b>6. Short-Term Assistance</b>	
<b>7. Term-Limited Assistance</b>	
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	
<b>9. Project-Based Voucher Program Flexibilities</b>	
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
<b>11. MTW Self-Sufficiency Program</b>	
<b>12. Work Requirement</b>	
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
<b>14. Moving on Policy</b>	
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
<b>17. Local, Non-Traditional Activities</b>	

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

<b>1.f. - Minimum Rent (HCV)</b>
In order to promote Self-sufficiency for our families and cost effectiveness for the RHA, the RHA plans to increase the minimum rent for families to \$100 over the next 2 years. We will start with a \$25 increase the first year and then increase by another \$25 the next.
This MTW activity serves the following statutory objectives: 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 to all assisted households
N/A
This MTW activity requires a Safe Harbor Waiver. The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).
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, Rosenberg 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.
The Impact Analysis that applies to this MTW activity also applies to the following MTW activities: 1.h. - Total Tenant Payment as a Percentage of Gross Income (HCV) 1.s. - Elimination of Deduction(s) (HCV)
minimum rent or minimum Total Tenant Payment (TTP) - \$75

<b>1.h. - Total Tenant Payment as a Percentage of Gross Income (HCV)</b>
Rent calculation is currently based on 30% of the participant's adjusted monthly income. The RHA will lower the percentage used to calculate rent to 27.5% of monthly gross income for all HCV participants and new admissions, and eliminate allowances and deductions (medical and child care) with minimal impact on the participants' rent portion.
This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency
This MTW activity serves the following statutory objectives: Decreased expenditures
N/A
This MTW activity requires a Safe Harbor Waiver. The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).
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, Rosenberg 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.
Percentage of income will equal 27.00% of the Total Tenant Payment (TTP)
Income basis for calculating Total Tenant Payment is : This activity uses a different definition of income because we are using the following MTW waivers (check all that apply) 1.r. and/or 1.s. "elimination of deductions" 1.t. and/or 1.u. "standard deductions"

<b>1.n. - Utility Reimbursements (HCV)</b>
RHA will eliminate Utility Reimbursements (UR) payments when the Utility allowance is greater than the TTP. Existing families receiving a UR payment will continue to receive until their next scheduled recertification. This will reduce the amount of fees the RHA must pay the bank each month when families do not cash their UR check. Since the increase in minimum rent waiver would reduce the amount of families that qualify for UR, this will not result in the Agency's per Family contribution increasing.
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 to all assisted households
N/A
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Rosenberg MTW agency Received 0 hardship requests

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

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

In order to increase Housing Choice, the RHA will change the Initial Rent burden from 40% to 45% of monthly adjusted income allowing families greater choice for the communities they seek to reside in.

The result will be an increased burden to the family should they choose to utilize this, but HAP would remain neutral.

This MTW activity serves the following statutory objectives:  
 Housing choice

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

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

N/A

No hardship were requested in the most recent fiscal year.

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

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

Maximum income-based rent percentage 45.00%

#### 1.s. - Elimination of Deduction(s) (HCV)

The RHA will lower the percentage used to calculate rent to 27.5% of monthly gross income for all HCV participants and new admissions, and eliminate allowances and deductions (dependent and child care) with minimal impact on the participants' rent portion.

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

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

N/A

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, Rosenberg 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.

Following deduction(s) will be eliminated, modified, or added.  
 Dependent allowance  
 Unreimbursed childcare costs

Other (please explain)

Families adjusted income will be 27.5% of gross income. There will be no dependent deductions or allowances for child care.

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

The HA is requesting the elimination of requesting asset income(bank account balances, life insurance policy cash value, retirement plan) when calculating your portion of rent.

This MTW activity serves the following statutory objectives:  
Cost effectiveness

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

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Rosenberg 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.  
Asset Income

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

The objectives of this activity are to provide a work incentive for all families and to reduce the burden on staff and families by reducing the frequency of income reexaminations.

The RHA defines workable families as families where the head or co-head are greater than 18, not disabled/elderly or a full-time student.

The RHA defines a non-workable family as families where the head or co-head are greater than 18, disabled/elderly or a full time student.

The RHA proposes the following changes:

Reexaminations will be reduced from annually to 2 (two) years for all workable families and non-workable families with wage income.

Exceptions: Families that have zero income, receive a minimum hardship or are workable families with no wage income will continue to meet with RHA annually.

Elderly/Disabled Families with 90% of income that is fixed will be conducted every three years.

Interims will still be conducted for changes in family composition or if the RHA initiates. Interim increases—that is, increases in income between annual reexaminations— will be disregarded with no need to report until the next scheduled biennial or triennial reexamination unless the family is receiving a minimum hardship, the family is a workable family now receiving wages ( recertification will change to biennial), the family is a FSS participant and the increase in wages will result in the family escrowing. Interim decreases, a reported decrease in income, will be limited to one during a calendar year if the decrease is greater than 10% with no interim decreases during the first six months after initial occupancy. If the interim decrease results in no income for the family, the family's reexam will then change to annually until income is restored.

This MTW activity serves the following statutory objectives:  
Cost effectiveness

This MTW activity serves the following statutory objectives:  
Increased expenditures

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

N/A

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, Rosenberg 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.
<p>Recertification Schedule is Other</p> <p>Exceptions: Families that claim to have zero income, are on a minimum hardship or are workable and not receiving wage income will continue to meet with RHA annually.</p> <p>Working families will change to a biennial recertification</p> <p>Elderly/Disabled Families with 90% of income that is fixed will be conducted every three years.</p> <p>Interims will still be conducted for changes in family composition and if the RHA must initiate. Interim increases—that is, increases in income between annual reexaminations— will be disregarded with no need to report until the next scheduled biennial or triennial reexamination unless the family is on a minimum hardship, is a workable family who is now receiving wage income, is a FSS participant who may not escrow. Interim decreases, a reported decrease in income, will be limited to one during a calendar year if the decrease is greater than 10% with no interim decreases during the first six months after initial occupancy. If the interim decrease results in no income for the family, the family's reexam will then change to annually until income is restored.</p>
Household may request 1 interim recertifications per year.
<p>Interims will still be conducted for changes in family composition and if the RHA must initiate. Interim increases—that is, increases in income between annual reexaminations— will be disregarded with no need to report until the next scheduled biennial or triennial reexamination unless the family is on a minimum hardship, is a workable family who is now receiving wage income, is a FSS participant who may not escrow. Interim decreases, a reported decrease in income, will be limited to one during a calendar year if the decrease is greater than 10% with no interim decreases during the first six months after initial occupancy. If the interim decrease results in no income for the family, the family's reexam will then change to annually until income is restored.</p>

<b>3.d. - Self-Certification of Assets (HCV)</b>
In order to help ease administrative burden, assets will be self-certified up to \$50,000, but we are requesting completely eliminating the assessment of assets.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Neutral (no cost implications)
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
N/A
<p>This MTW activity requires a Safe Harbor Waiver.</p> <p>The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).</p>
No hardship were requested in the most recent fiscal year.
<p>In the prior year, under this activity, Rosenberg MTW agency</p> <p>Received 0 hardship requests</p> <p>Approved hardship requests</p> <p>Denied hardship requests</p> <p>There is\are hardship requests pending.</p>
The dollar threshold for the self-certification of assets is \$50,000.

<b>5.d. - Alternative Inspection Schedule (HCV)</b>
The RHA currently conducts biennial inspections after 1 year on the program. During the next scheduled biennial inspection, if the unit passes at the first inspection, the tenant will change to a triennial inspection. This will only be applicable to families that have stayed in place and have not only passed an inspection after 1 year, but also after 1 biennial inspection. So, the family will not be eligible for a triennial inspection until after their 3rd year on the program.
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:

Currently assisted households only
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
N/A
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Rosenberg MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.



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

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>
<b>E.1</b>	<b>Agency-Specific Waiver(s) for HUD Approval:</b>  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.  No Agency-Specific Waivers are being requested.
<b>E.2</b>	<b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b> MTW Agency does not have approved Agency-Specific Waivers

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

<b>Federal Fiscal Year (FFY)</b>	<b>Total Operating Subsidy Authorized Amount</b>	<b>How Much PHA Disbursed by the 9/30 Reporting Period</b>	<b>Remaining Not Yet Disbursed</b>	<b>Deadline</b>
----------------------------------	--	--	------------------------------------	-----------------

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

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

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>
MTW agency established a rent reform policy to encourage employment and self-sufficiency	

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

<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.	

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

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

<b>I.</b>	<b>Evaluations.</b>
No known evaluations.	

### **Impact Analysis for Reexaminations**

The reduction in the frequency of reexaminations provides an incentive to work for all families—including elderly families and/or people with disabilities who wish to be employed—who will not be subject to a rent increase when their income increases resulting in self-sufficiency successes such as new employment or job promotion. Through this activity, the RHA is reducing the regulatory burden both on the participant families and staff to allow a greater focus on people—not paperwork.

There will be an increase in HAP costs initially because increases will no longer be reported, but should level out over time as families are able to keep their wages for longer periods of time, and be assured of their rent not changing.

Applies to all assisted households. The RHA will start transitioning families to the different reexam schedule once approved by HUD based on the income from the previous annual. For those workable families that will switch to biennial, the RHA will break up the alphabet and recertify A-M the first year and then switch to biennials but allow N-Z to be recertified in the 2<sup>nd</sup> year.

Families working will have higher wages and will have a consistent rent burden. Because the family can keep more of their wages, their rent burden should go down.

This activity will have no impact on the Waiting List

No impact on terminations

Occupancy level and utilization should increase and then stabilize as a result of lack of repayment agreements for failure to report income.

This will meet the statutory goals of cost effectiveness and self-sufficiency. The RHA for the first 5 months of the FY have done an average of 31 Interims a month. In March, the RHA changed to only doing decreases and the average has dropped to 10.

This could result in an increase of hardships for those who have more than 1 decrease of income in a year and are unable to replace the income lost.

See Hardship Policy 2

## MTW Waivers and Impact Analysis

### **3.d Self Certification of Assets**

In order to help ease administrative burden, assets will be self-certified up to \$50,000. After reviewing current families who have asset income, 15 of the 449 sampled had assets over \$5000, adding less than \$15 to annual income. The largest asset was \$43,000 which added \$44 to annual income.

No impact on the agency's finances.

No impact on the affordability of housing costs.

No impact on the waiting list

No impact on the termination rate

No impact on occupancy levels

It will result in cost effectiveness for the agency. Reducing time and paperwork to retrieve bank statements, life insurance policies cash value, etc...

Will have no impact on the agency's ability to achieve MTW statutory requirements.

There will be no hardship requests

Will not impact any protected class.

### **Hardship Policy**

This has no negative impact on the family, so no hardship policy needed.

### **1.f Minimum Rent**

In order to promote Self-sufficiency for our families and cost effectiveness for the RHA, the RHA plans to increase the minimum rent for families to \$100 over the next 2 years. We will start with a \$25 increase the first year and then increase by another \$25 the next.

Hardship Policy 1 (see below)

### **1.h Tenant Payment as a modified percentage of Income**

Rent calculation is currently based on 30% of the participant's adjusted monthly income. The RHA will lower the percentage used to calculate rent to 27.5% of monthly gross income for all HCV participants and new admissions, and eliminate allowances and deductions (medical and child care) with minimal impact on the participants' rent portion.

Participants granted the hardship exemption will not be eligible for biennial or triennial reexaminations.

Hardship Policy 3

**Impact Analysis for Rent based on 27.5% of Annual Income, Minimum Rent, Eliminate Utility Reimbursement Checks**

The impact on agency finances will result in reduced HAP costs based on sampled families, by \$632 and reduced UR payments by \$615.

The impact on housing costs for the family increased by \$1 on Average. 21 Families would see an increase of TTP > \$50 and would be eligible for a hardship.

No impact on the waiting list

No impact on the termination rate.

No impact on utilization rate

Meets the MTW statutory goals of family self-sufficiency and cost effectiveness.

Meets the MTW statutory requirement of a reasonable rent policy that encourages employment and self-sufficiency.

Of the families sampled, 21 Families would see their TTP increase greater than \$50, so they would be eligible for a hardship waiver. Therefore, the impact on the hardship requests should be similar if not less than the effects of COVID on TTP.

No impact on protected classes. Elderly and disabled families are not at minimum rent, so it has no effect on them.



### **1.n. Utility Reimbursement**

RHA will eliminate Utility Reimbursements payments when the Utility allowance is greater than the TTP.

This will reduce the amount of fees the RHA must pay the bank each month when families do not cash their UR check. Since the increase in minimum rent waiver would reduce the amount of families that qualify for UR, this will not result in the Agency's per Family contribution increasing.

This will result in about 11 family's paying more towards their housing costs because they will no longer receive the reimbursement check to offset those utility costs.

No impact on the waiting list.

No impact on the termination rate of families.

Will not affect the Utilization rate.

Will meet the MTW goal of cost effectiveness for the RHA. No longer spending the time to issue UR checks and 60 days later stop payment on them. Will also reduce the fees the RHA must pay to stop the checks. Will meet the MTW goal of family self-sufficiency.

Will meet the MTW requirement for a reasonable rent policy that encourages employment and family self-sufficiency.

Will not affect protected classes.

### **3.b Reduction in the Frequency of Reexaminations**

The objectives of this activity are to provide a work incentive for all families and to reduce the burden on staff and families by reducing the frequency of income reexaminations. The RHA proposes the following changes:

Reexaminations will be reduced from annually to 2 (two) years for all families.

Exceptions: Families that claim to have zero income will continue to meet with RHA annually.

Elderly/Disabled Families with 90% of income that is fixed will be conducted every three years.

Interims will still be conducted for changes in family composition. Interim increases—that is, increases in income between annual reexaminations— will be disregarded with no need to report until the next scheduled biennial or triennial reexamination. Interim decreases, a reported decrease in income, will be limited to one during a calendar year if the decrease is greater than 10% with no interim decreases during the first six months after initial occupancy. If the interim decrease results in no income for the family, the family's reexam will then change to annually until income is restored.

### **Impact Analysis for Reexaminations**

The reduction in the frequency of reexaminations provides an incentive to work for all families—including elderly families and/or people with disabilities who wish to be employed—who will not be subject to a rent increase when their income increases resulting in self-sufficiency successes such as new employment or job promotion. Through this activity, the RHA is reducing the regulatory burden both on the participant families and staff to allow a greater focus on people—not paperwork.

There will be an increase in HAP costs initially because increases will no longer be reported, but should level out over time as families are able to keep their wages for longer periods of time, and be assured of their rent not changing.

Applies to all assisted households. The RHA will start transitioning families to the different reexam schedule once approved by HUD based on the income from the previous annual. For those workable families that will switch to biennial, the RHA will break up the alphabet and recertify A-M the first year and then switch to biennials but allow N-Z to be recertified in the 2<sup>nd</sup> year.

Families working will have higher wages and will have a consistent rent burden. Because the family can keep more of their wages, their rent burden should go down.

This activity will have no impact on the Waiting List

No impact on terminations

Occupancy level and utilization should increase and then stabilize as a result of lack of repayment agreements for failure to report income.

This will meet the statutory goals of cost effectiveness and self-sufficiency. The RHA for the first 5 months of the FY have done an average of 31 Interims a month. In March, the RHA changed to only doing decreases and the average has dropped to 10.

This could result in an increase of hardships for those who have more than 1 decrease of income in a year and are unable to replace the income lost.

See Hardship Policy 2

#### **5.d Alternative Inspection Schedule**

The RHA currently conducts biennial inspections after 1 year on the program. During the next scheduled biennial inspection, if the unit passes at the first inspection, the tenant will change to a triennial inspection. This will only be applicable to families that have stayed in place and have not only passed an inspection after 1 year, but also after 1 biennial inspection. So, the family will not be eligible for a triennial inspection until after their 3<sup>rd</sup> year on the program.

**Hardship Policy Minimum Rent**

Families could request a hardship if the family experienced a decrease in income because of a changed circumstance due to loss/reduction in employment through no fault of their own, death in the family's income earner, reduction in other earnings or assistance that cannot be replaced, or if there has been an increase because of changed circumstances for medical costs, childcare, transportation, education...

Proof must provide supporting evidence of how the minimum rent increase causes an undue financial burden and may include current expenses related to childcare, health, transportation, and similar supporting proof.

**Hardship Policy 2**

Families may request a hardship to request a second interim reexam if the family experienced a second decrease in a year as a result of a change of family composition, the loss of income cannot be replaced, disability related, and the loss is through no fault of their own.

**Hardship Policy 3**

For families who have experienced an increase of greater than \$50 in rent due to the rent simplification calculation, the RHA will phase in the increase. The RHA will calculate both rent calculation methods and the base will be the old method plus an additional \$50 for each successive annual re-examination until the phase exceeds or matches the new calculation. In no case will the hardship TTP be less than the \$75 minimum rent.

### **1.o Initial Rent Burden**

IN order to increase Housing Choice, the RHA will change the Initial Rent burden from 40% to 45% of monthly adjusted income allowing families greater choice for the communities they seek to reside in.

The result will be an increased burden to the family should they choose to utilize this, but HAP would remain neutral.

Will apply to all assisted households

Will affect new and existing households.

Will apply to all family types



**Impact Analysis for Initial Rent Burden**

Agency finances will remain neutral. Families who choose to take advantage of the 45% rent burden will pay more towards their housing costs, but will be given more choice in choosing their housing options.

No affect on waiting list.

The family will be allowed to request an Interim Decrease if their income is reduced within the year and the RHA will be able to pay up to the payment standard. Could result in more terminations, if the family is not able to pay their portion of the rent above the payment standard.

Utilization of HCV should remain the same if not increase due to more options for housing.

The impact will be Housing Choice

Will allow agency to maintain a reasonable rent policy

No effect on protected classes.

## **Safe Harbor Waiver – 1.f Minimum Rent, 1.h Tenant Payment % of Income and 1.s Elimination of Deductions**

1.f Minimum Rent allows the agency to set the minimum rent higher than currently allowed under regulation.

1.h Tenant Payment as a modified percentage of Income.

1.s Elimination of Deductions allows the agency to eliminate one, some or all deductions

All the waivers mentioned above state that an agency must exempt elderly/disabled families from the rent policy.

The RHA is requesting the same rent policy for all households including elderly/disabled families.

Regarding Minimum Rent, the increase from \$50 to \$75 does not negatively effect the elderly/disabled, because all of our elderly/disabled families except 1 are paying above the \$75 minimum rent. The one family below minimum rent already has a hardship for the minimum rent, and that would continue as long as the family qualifies.

Regarding Tenant % of Gross Income and Elimination of Deductions,

Of the 331 Families that were sampled, 165 are elderly/disabled families.

126 would see a decrease in their portion by implementing the new rent policy.

39 would see an increase in their portion. With 5 of those families having a rent increase greater than >\$50 and may require a hardship.

Those with the greatest impact are families currently requesting a large medical expense allowance.

**Hardship:** For the 5 that that would see an increase of >\$50. The RHA will apply the same hardship for everyone else which would allow for a phase-in approach. The agency would calculate both methods and the base will be the old method +\$50 until the phase in matches the new calculation.

The HA held public meeting on March 9<sup>th</sup> and April 3<sup>rd</sup> of 2021. One family requested when they could port and when the changes would go into effect. The family was told tentatively October 2021. No specific comment was mentioned regarding minimum rent, the new rent calculation and elimination of deductions other than being thankful for the simpler rent calculation that was easier to understand. No change to the requested waiver is needed.

### **Safe Harbor Waiver –3.D Self Certification of Assets.**

The current self certification of assets waiver allows for the family to self-certify at their reexamination for all assets up to \$50,000.

The HA is requesting the elimination of requesting asset income(bank account balances, life insurance policy cash value, retirement plan) when calculating your portion of rent. The current practice is an administrative burden without much return.

Only 18 of RHA households had any income from assets and the largest income from assets ranging for \$3- \$30 of added income.

This change will clearly reduce the HA's and the clients' administrative burden in having to provide/collect this information for a miniscule addition to gross income.

### **Impact Analysis**

1. It will have no effect on the Agencies finances. The greatest impact would be 1 family where the asset resulted in \$13 to annual income.
2. The HCV families have very little to no assets that would be applied to annual income, therefore, it will not have a negative impact on the family or on the RHA's finances.
3. No effect on Waiting List
4. No effect on Terminations
5. No effect on Occupancy Levels
6. It would result in the MTW goal of cost effectiveness for the agency
7. Would not effect the ability of the agency to meet MTW requirements
8. Would not result in additional hardship request
9. No impact on protective classes.

The HA held public meeting on March 9<sup>th</sup> and April 3<sup>rd</sup> of 2021. No specific comment was mentioned regarding elimination of assets other than being thankful for the simpler rent calculation that was easier to understand. No change to the requested waiver is needed.

### **Agency Specific – Portability**

The agency is requesting to restrict portability except for households that need to move out of the jurisdiction due to reasonable accommodations, employment, situations covered underneath the Violence Against Women Act (VAWA) and education.

The RHA would also allow a family to port-out if the receiving housing agency absorbs.

This would cut back on the administrative money leaving housing authority and reduce the individuals just requesting portability for no valid reason. This results in administrative time being used to send the portability paperwork, and in most cases have it returned back and deal with the ramifications when their current unit was already leased up and now they've lost their voucher.

It would be for all population and household types. The reasons that portability will be allowed would be for the reasons stated above.

### **Impact Analysis**

1. Agencies finances would be affected positively by leaving administrative money with our agency rather than sending it to another PHA.
2. It would have no affect on housing costs for affected families
3. IT would have no affect on the waiting list
4. It could possibly reduce termination because many times families choose to port; they can't find a place to live at the ported PHA; they decide to return and their unit has been rented out and their voucher expires and they are removed from housing.
5. It should help stabilize the occupancy and utilization rate at the RHA.
6. It would result in cost effectiveness of the agency by reducing the administrative time to port the family out and then deal with the family when they return for failure to lease up.
7. Families will be allowed to port for reasonable accommodations, employment and situations covered under VAWA.
8. It should have no impact on protected classes.

The HA held public meeting on March 9<sup>th</sup> and April 3<sup>rd</sup> of 2021. One client wanted to know when they would be allowed to port, but no specific comment was mentioned regarding the changes in the portability process. No change to the requested waiver is needed.

**Hardship Policy - 2<sup>nd</sup> Interim Decreases**

Families may request a hardship to request a second interim reexam if the family experienced a second decrease in a year as a result of a change of family composition, the loss of income cannot be replaced, disability related, income decreased 10% or more, and the loss is through no fault of their own.

## MTW Waivers and Impact Analysis

### **3.d Self Certification of Assets**

In order to help ease administrative burden, assets will be self-certified up to \$50,000. After reviewing current families who have asset income, 15 of the 449 sampled had assets over \$5000, adding less than \$15 to annual income. The largest asset was \$43,000 which added \$44 to annual income.

No impact on the agency's finances.

No impact on the affordability of housing costs.

No impact on the waiting list

No impact on the termination rate

No impact on occupancy levels

It will result in cost effectiveness for the agency. Reducing time and paperwork to retrieve bank statements, life insurance policies cash value, etc...

Will have no impact on the agency's ability to achieve MTW statutory requirements.

There will be no hardship requests

Will not impact any protected class.

### **Hardship Policy**

This has no negative impact on the family, so no hardship policy needed.

### **1.f Minimum Rent**

In order to promote Self-sufficiency for our families and cost effectiveness for the RHA, the RHA plans to increase the minimum rent for families to \$100 over the next 2 years. We will start with a \$25 increase the first year and then increase by another \$25 the next.

Hardship Policy 1 (see below)

### **1.h Tenant Payment as a modified percentage of Income**

Rent calculation is currently based on 30% of the participant's adjusted monthly income. The RHA will lower the percentage used to calculate rent to 27.5% of monthly gross income for all HCV participants and new admissions, and eliminate allowances and deductions (medical and child care) with minimal impact on the participants' rent portion.

Participants granted the hardship exemption will not be eligible for biennial or triennial reexaminations.

Hardship Policy 3



**Impact Analysis for Rent based on 27.5% of Annual Income, Minimum Rent, Eliminate Utility Reimbursement Checks**

The impact on agency finances will result in reduced HAP costs based on sampled families, by \$632 and reduced UR payments by \$615.

The impact on housing costs for the family increased by \$1 on Average. 21 Families would see an increase of TTP > \$50 and would be eligible for a hardship.

No impact on the waiting list

No impact on the termination rate.

No impact on utilization rate

Meets the MTW statutory goals of family self-sufficiency and cost effectiveness.

Meets the MTW statutory requirement of a reasonable rent policy that encourages employment and self-sufficiency.

Of the families sampled, 21 Families would see their TTP increase greater than \$50, so they would be eligible for a hardship waiver. Therefore, the impact on the hardship requests should be similar if not less than the effects of COVID on TTP.

No impact on protected classes. Elderly and disabled families are not at minimum rent, so it has no effect on them.

### **1.n. Utility Reimbursement**

RHA will eliminate Utility Reimbursements payments when the Utility allowance is greater than the TTP.

This will reduce the amount of fees the RHA must pay the bank each month when families do not cash their UR check. Since the increase in minimum rent waiver would reduce the amount of families that qualify for UR, this will not result in the Agency's per Family contribution increasing.

This will result in about 11 family's paying more towards their housing costs because they will no longer receive the reimbursement check to offset those utility costs.

No impact on the waiting list.

No impact on the termination rate of families.

Will not affect the Utilization rate.

Will meet the MTW goal of cost effectiveness for the RHA. No longer spending the time to issue UR checks and 60 days later stop payment on them. Will also reduce the fees the RHA must pay to stop the checks. Will meet the MTW goal of family self-sufficiency.

Will meet the MTW requirement for a reasonable rent policy that encourages employment and family self-sufficiency.

Will not affect protected classes.

### **3.b Reduction in the Frequency of Reexaminations**

The objectives of this activity are to provide a work incentive for all families and to reduce the burden on staff and families by reducing the frequency of income reexaminations. The RHA proposes the following changes:

Reexaminations will be reduced from annually to 2 (two) years for all families.

Exceptions: Families that claim to have zero income will continue to meet with RHA annually.

Elderly/Disabled Families with 90% of income that is fixed will be conducted every three years.

Interims will still be conducted for changes in family composition. Interim increases—that is, increases in income between annual reexaminations— will be disregarded with no need to report until the next scheduled biennial or triennial reexamination. Interim decreases, a reported decrease in income, will be limited to one during a calendar year if the decrease is greater than 10% with no interim decreases during the first six months after initial occupancy. If the interim decrease results in no income for the family, the family's reexam will then change to annually until income is restored.

### **Impact Analysis for Reexaminations**

The reduction in the frequency of reexaminations provides an incentive to work for all families—including elderly families and/or people with disabilities who wish to be employed—who will not be subject to a rent increase when their income increases resulting in self-sufficiency successes such as new employment or job promotion. Through this activity, the RHA is reducing the regulatory burden both on the participant families and staff to allow a greater focus on people—not paperwork.

There will be an increase in HAP costs initially because increases will no longer be reported, but should level out over time as families are able to keep their wages for longer periods of time, and be assured of their rent not changing.

Applies to all assisted households. The RHA will start transitioning families to the different reexam schedule once approved by HUD based on the income from the previous annual. For those workable families that will switch to biennial, the RHA will break up the alphabet and recertify A-M the first year and then switch to biennials but allow N-Z to be recertified in the 2<sup>nd</sup> year.

Families working will have higher wages and will have a consistent rent burden. Because the family can keep more of their wages, their rent burden should go down.

This activity will have no impact on the Waiting List

No impact on terminations

Occupancy level and utilization should increase and then stabilize as a result of lack of repayment agreements for failure to report income.

This will meet the statutory goals of cost effectiveness and self-sufficiency. The RHA for the first 5 months of the FY have done an average of 31 Interims a month. In March, the RHA changed to only doing decreases and the average has dropped to 10.

This could result in an increase of hardships for those who have more than 1 decrease of income in a year and are unable to replace the income lost.

See Hardship Policy 2

#### **5.d Alternative Inspection Schedule**

The RHA currently conducts biennial inspections after 1 year on the program. During the next scheduled biennial inspection, if the unit passes at the first inspection, the tenant will change to a triennial inspection. This will only be applicable to families that have stayed in place and have not only passed an inspection after 1 year, but also after 1 biennial inspection. So, the family will not be eligible for a triennial inspection until after their 3<sup>rd</sup> year on the program.

**Hardship Policy Minimum Rent**

Families could request a hardship if the family experienced a decrease in income because of a changed circumstance due to loss/reduction in employment through no fault of their own, death in the family's income earner, reduction in other earnings or assistance that cannot be replaced, or if there has been an increase because of changed circumstances for medical costs, childcare, transportation, education...

Proof must provide supporting evidence of how the minimum rent increase causes an undue financial burden and may include current expenses related to childcare, health, transportation, and similar supporting proof.

**Hardship Policy 2**

Families may request a hardship to request a second interim reexam if the family experienced a second decrease in a year as a result of a change of family composition, the loss of income cannot be replaced, disability related, and the loss is through no fault of their own.

**Hardship Policy 3**

For families who have experienced an increase of greater than \$50 in rent due to the rent simplification calculation, the RHA will phase in the increase. The RHA will calculate both rent calculation methods and the base will be the old method plus an additional \$50 for each successive annual re-examination until the phase exceeds or matches the new calculation. In no case will the hardship TTP be less than the \$75 minimum rent.



### **1.o Initial Rent Burden**

IN order to increase Housing Choice, the RHA will change the Initial Rent burden from 40% to 45% of monthly adjusted income allowing families greater choice for the communities they seek to reside in.

The result will be an increased burden to the family should they choose to utilize this, but HAP would remain neutral.

Will apply to all assisted households

Will affect new and existing households.

Will apply to all family types

### **Impact Analysis for Initial Rent Burden**

Agency finances will remain neutral. Families who choose to take advantage of the 45% rent burden will pay more towards their housing costs, but will be given more choice in choosing their housing options.

No affect on waiting list.

The family will be allowed to request an Interim Decrease if their income is reduced within the year and the RHA will be able to pay up to the payment standard. Could result in more terminations, if the family is not able to pay their portion of the rent above the payment standard.

Utilization of HCV should remain the same if not increase due to more options for housing.

The impact will be Housing Choice

Will allow agency to maintain a reasonable rent policy

No effect on protected classes.

## **Safe Harbor Waiver – 1.f Minimum Rent, 1.h Tenant Payment % of Income and 1.s Elimination of Deductions**

1.f Minimum Rent allows the agency to set the minimum rent higher than currently allowed under regulation.

1.h Tenant Payment as a modified percentage of Income.

1.s Elimination of Deductions allows the agency to eliminate one, some or all deductions

All the waivers mentioned above state that an agency must exempt elderly/disabled families from the rent policy.

The RHA is requesting the same rent policy for all households including elderly/disabled families.

Regarding Minimum Rent, the increase from \$50 to \$75 does not negatively effect the elderly/disabled, because all of our elderly/disabled families except 1 are paying above the \$75 minimum rent. The one family below minimum rent already has a hardship for the minimum rent, and that would continue as long as the family qualifies.

Regarding Tenant % of Gross Income and Elimination of Deductions,

Of the 331 Families that were sampled, 165 are elderly/disabled families.

126 would see a decrease in their portion by implementing the new rent policy.

39 would see an increase in their portion. With 5 of those families having a rent increase greater than >\$50 and may require a hardship.

Those with the greatest impact are families currently requesting a large medical expense allowance.

**Hardship:** For the 5 that that would see an increase of >\$50. The RHA will apply the same hardship for everyone else which would allow for a phase-in approach. The agency would calculate both methods and the base will be the old method +\$50 until the phase in matches the new calculation.

The HA held public meeting on March 9<sup>th</sup> and April 3<sup>rd</sup> of 2021. One family requested when they could port and when the changes would go into effect. The family was told tentatively October 2021. No specific comment was mentioned regarding minimum rent, the new rent calculation and elimination of deductions other than being thankful for the simpler rent calculation that was easier to understand. No change to the requested waiver is needed.

### **Safe Harbor Waiver –3.D Self Certification of Assets.**

The current self certification of assets waiver allows for the family to self-certify at their reexamination for all assets up to \$50,000.

The HA is requesting the elimination of requesting asset income(bank account balances, life insurance policy cash value, retirement plan) when calculating your portion of rent. The current practice is an administrative burden without much return.

Only 18 of RHA households had any income from assets and the largest income from assets ranging for \$3- \$30 of added income.

This change will clearly reduce the HA's and the clients' administrative burden in having to provide/collect this information for a miniscule addition to gross income.

### **Impact Analysis**

1. It will have no effect on the Agencies finances. The greatest impact would be 1 family where the asset resulted in \$13 to annual income.
2. The HCV families have very little to no assets that would be applied to annual income, therefore, it will not have a negative impact on the family or on the RHA's finances.
3. No effect on Waiting List
4. No effect on Terminations
5. No effect on Occupancy Levels
6. It would result in the MTW goal of cost effectiveness for the agency
7. Would not effect the ability of the agency to meet MTW requirements
8. Would not result in additional hardship request
9. No impact on protective classes.

The HA held public meeting on March 9<sup>th</sup> and April 3<sup>rd</sup> of 2021. No specific comment was mentioned regarding elimination of assets other than being thankful for the simpler rent calculation that was easier to understand. No change to the requested waiver is needed.

### **Agency Specific – Portability**

The agency is requesting to restrict portability except for households that need to move out of the jurisdiction due to reasonable accommodations, employment, situations covered underneath the Violence Against Women Act (VAWA) and education.

The RHA would also allow a family to port-out if the receiving housing agency absorbs.

This would cut back on the administrative money leaving housing authority and reduce the individuals just requesting portability for no valid reason. This results in administrative time being used to send the portability paperwork, and in most cases have it returned back and deal with the ramifications when their current unit was already leased up and now they've lost their voucher.

It would be for all population and household types. The reasons that portability will be allowed would be for the reasons stated above.

### **Impact Analysis**

1. Agencies finances would be affected positively by leaving administrative money with our agency rather than sending it to another PHA.
2. It would have no affect on housing costs for affected families
3. IT would have no affect on the waiting list
4. It could possibly reduce termination because many times families choose to port; they can't find a place to live at the ported PHA; they decide to return and their unit has been rented out and their voucher expires and they are removed from housing.
5. It should help stabilize the occupancy and utilization rate at the RHA.
6. It would result in cost effectiveness of the agency by reducing the administrative time to port the family out and then deal with the family when they return for failure to lease up.
7. Families will be allowed to port for reasonable accommodations, employment and situations covered under VAWA.
8. It should have no impact on protected classes.

The HA held public meeting on March 9<sup>th</sup> and April 3<sup>rd</sup> of 2021. One client wanted to know when they would be allowed to port, but no specific comment was mentioned regarding the changes in the portability process. No change to the requested waiver is needed.

**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.

Fort Bend County Housing Authority

TX483

**MTW PHA NAME****MTW PHA NUMBER/HA CODE**

*I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).*

Dr. Larry Wilkinson

Chair

**NAME OF AUTHORIZED OFFICIAL****TITLE****SIGNATURE****DATE**

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

**Hardship Policy 3**

For families who have experienced an increase of greater than \$50 in rent due to the rent simplification calculation, the RHA will phase in the increase. The RHA will calculate both rent calculation methods and the base will be the old method plus an additional \$50 for each successive year until the phase exceeds or matches the new calculation. In no case will the hardship TTP be less than the \$75 minimum rent.



**Impact Analysis for Initial Rent Burden**

Agency finances will remain neutral. Families who choose to take advantage of the 45% rent burden will pay more towards their housing costs, but will be given more choice in choosing their housing options.

No affect on waiting list.

The family will be allowed to request an Interim Decrease if their income is reduced within the year and the RHA will be able to pay up to the payment standard. Could result in more terminations, if the family is not able to pay their portion of the rent above the payment standard.

Utilization of HCV should remain the same if not increase due to more options for housing.

The impact will be Housing Choice

Will allow agency to maintain a reasonable rent policy

No effect on protected classes.