

PHA Name : Rosenberg

PHA Code : TX483

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

PHA Program Type: Housing Choice Voucher (HCV) only

MTW Cohort Number: MTW Flexibility for Smaller PHAs

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The Rosenberg Housing Authority planned on reducing cost and achieving greater cost effectiveness by simplifying the rent process, reducing verification needing at an annual, and changing the re-exam schedule for families based on their income. Due to a continued delay of the new PIC system, the housing authority has not been able to determine whether the new rent process will achieve cost effectiveness or not. We hope to try it in the 2023-2024 fiscal year if the system allows us to do so.

The housing authority implemented the change in the re-exam schedule which has resulted in fewer re-exams being done each month which has resulted in some cost effectiveness. However, it has increased the administrative burden due to the fact that HIP is not available. Therefore, the RHA must keep the schedule manually. Therefore, beginning this fiscal year, the RHA plans to change everyone to 3 year re-exams. Those who have been seen the last 2 years will be skipped and those scheduled and the remainder will be seen.

The housing authority also changed the process for interims which has greatly reduced the time and number of interims processed each month. However, we will make changes this year to allow for decreases only if income decreases by 20%, and we will adjust the reasons that Interims can be requested. If the family is currently in the reexamination process, interims will not be conducted in that 4 month period. However, any changes requested in that time will be adjusted and included in the current reexamination. These changes should result in cost effectiveness and provide incentives to continue working.

The housing authority plans on implementing a change in payments standards to better reflect the diversity of Fort Bend County. the housing authority has noticed that most of our participants reside in the Rosenberg zip code. We will change to payment standards based upon grouped zip codes in order to allow our families more choice throughout all of the county. Due to the rising rent market. The housing authority will continue to keep the Initial Rent Burden at 45%. This has helped our families compete with unassisted families in the open market. The success rate of our vouchers has not decreased as a result.

The housing authority will no longer define a workable and non-workable family since all re-exams will be changed to 3 years regardless of the type of income.

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	
b. Tiered Rent (HCV)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
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
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Currently Implementing
o. Initial Rent Burden (HCV)	Currently Implementing
q. Imputed Income (HCV)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Plan to Implement in the Submission Year
u. Standard Deductions (HCV)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Currently Implementing
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Plan to Implement in the Submission Year
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
3. Reexaminations	
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
d. Self-Certification of Assets (HCV)	Not Currently Implemented
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Not Currently Implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Not Currently Implemented
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Currently Implementing
6. Short-Term Assistance	
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	
Increase Elderly Age (PH & HCV)	Not Currently Implemented
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Not Currently Implemented
b. Increase PBV Project Cap (HCV)	Not Currently Implemented
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
10. Family Self-Sufficiency Program with MTW Flexibility	
a.HCV Waive Operating a Required FSS Program (HCV)	Currently Implementing
b. HCV Alternative Structure for Establishing Program	

Coordinating Committee (HCV)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
11. MTW Self-Sufficiency Program	
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
12. Work Requirement	
b. Work Requirement (HCV)	Not Currently Implemented
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
14. Moving on Policy	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
15. Acquisition without Prior HUD Approval (PH)	
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented
c. Housing Development Programs	Not Currently Implemented

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

1.f. - Minimum Rent (HCV)
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>The housing authority did not implement this in the previous year due to the issues with waivers being accepted through PIC. If the new HIP system will allow for this, we will implement this year.</p> <p>So, 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.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Self-sufficiency</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Decreased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>Was unable to implement previously</p>

Does this MTW activity require a hardship policy?
Provided Already
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?
No
Does the MTW activity require an impact analysis?
Provided Already
How much is the minimum rent or minimum Total Tenant Payment (TTP)?
\$75.00

1.h. - Total Tenant Payment as a Percentage of Gross Income (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative
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 (child care) with minimal impact on the participants' rent portion.
Which of the MTW statutory objectives does this MTW activity serve?
Cost effectiveness; Self-sufficiency
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.
Decreased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?
The MTW activity applies only to a subset or subsets of assisted households
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?
New admissions and currently assisted households
Does the MTW activity apply to all family types or only to selected family types?
The MTW activity applies only to selected family types
Please select the family types subject to this MTW activity.
Non-elderly, non-disabled families
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?
The MTW activity applies to all tenant-based units
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.
We were unable to implement.
Does this MTW activity require a hardship policy?

Yes

This document is attached.

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

No

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

Yes

What considerations led the MTW agency to modify the hardship policy?

The rent reform hasn't been implemented yet. However, based upon what was originally submitted in 2021, the previous hardship policy would have resulted in an administrative burden of needing to remember to increase tenant rent each year by \$50. This hardship will give tenant's a reprieve from the change in rent for 1- 3 year reexam and will not require as much follow up.

How many hardship requests have been received associated with this activity in the past year?

No hardship were requested in the most recent fiscal year.

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

No

Does the MTW activity require an impact analysis?

Provided Already

What percentage of income will equal the Total Tenant Payment (TTP)?

27.50%

What is the income basis for calculating Total Tenant Payment?

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.n. - Utility Reimbursements (HCV)

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

RHA eliminated utility reimbursement (UR) payments when the utility allowance is greater than the TTP.

Existing families who received a UR payment were given a 30 day notice before UR payments stopped. This waiver reduced the administrative burden on stopping payments on families who do not cash their UR check and of calling families back when the checks are returned.

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

Cost effectiveness; Self-sufficiency

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

Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies to all family types

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

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

All Tenant-based except VASH and FYI vouchers.

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

With the removal of the UR checks, the money saved has been used to hire a full-time inspector.

1.o. - Initial Rent Burden (HCV)

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

The RHA has changed the initial rent burden from 40% to 45% of monthly adjusted income allowing greater choice for the communities families week to reside in.

The result is an increased burden on the family should they utilize this, but the HAP will remain neutral.

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

Self-sufficiency; Housing choice

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

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

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

New admissions and currently assisted households

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

The MTW activity applies to all family types

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

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

Applies to all household except VASH

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

The housing authority has made no changes to the 45% initial rent burden. The housing authority's voucher success rate has remained level and in some cases increased even with the increased rent prices.

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

No

Does the MTW activity require an impact analysis?

No

No document is attached.

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

45.00%

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

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

The RHA plans to eliminate dependent and child care deductions. This will result in administrative efficiencies and self-sufficiency.

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

Cost effectiveness; Self-sufficiency

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

Neutral (no cost implications)

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

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

The MTW activity applies to all tenant-based units

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

We were unable to implement.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Provided Already

Which deduction(s) will be eliminated, modified, or added?

Dependent allowance; Unreimbursed childcare costs

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

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

The RHA eliminated requesting asset income when calculating rent.

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

Cost effectiveness

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

Neutral (no cost implications)

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

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

The MTW activity applies to all tenant-based units

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

The re-exam process moves quickly because there are less verifications that families must provide.

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

No

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

Asset Income

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

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

Currently, the RHA has only 1 payment standard for all Fort Bend County.
The RHA proposes to group zip codes and create 3 payment standards for Fort Bend County in order to allow families more choice outside the local Rosenberg/Richmond Area.

RHA's goal is to utilize a comprehensive approach to expand housing opportunities for HCV participants and to increase landlord participation in the HCV Program.

RHA will increase housing choices for HCV participants to live in areas of opportunity based on Payment Standards between 80% and 150% of the SAFMRs.

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

Self-sufficiency; Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

This will be the first year we are implementing.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

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

No

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?
No
How many hardship requests have been received associated with this activity in the past year?
No hardship were requested in the most recent fiscal year.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?
No
Does the MTW activity require an impact analysis?
Yes This document is attached.
Does the impact analysis apply to more than this MTW activity?
No
Please explain the payment standards by ZIP code or "grouped" ZIP codes:
Among the geographic considerations in grouping SAFMRs, RHA is considering grouping the following ZIP codes in Fort Bend County: 77423, 77494, 77450, 77406, 77407, 77083, 77498, 77099, 77479, 77478, 77477, 77489, 77085, 77053, 77545, 77459, and 77479. In addition to Rosenberg, RHA operates is voucher program in Fort Bend County under an intergovernmental agreement with Fort Bend County.

3.b. - Alternative Reexamination Schedule for Households (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative
The RHA will change all participants to a 3 year re-examination period regardless of source of income in order to achieve administrative efficiency. Interim increases will not be conducted unless currently TTP is less than or equal to minimum rent, or zero earned income. Interims must be conducted when a child has turned 18 and is now an adult and for any other family composition change. Interim decrease will be conducted once per year for a decrease greater than 20%, and only after 6 months of initial occupancy (including port-ins) or 6 months after a move. Interims will not be conducted if the family is currently in the re-examination process, or if the family currently has a voucher to move or lease up. The adjustment will be made with the annual or initial submission..
Which of the MTW statutory objectives does this MTW activity serve?
Cost effectiveness
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.
Neutral (no cost implications)
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?
The MTW activity applies to all assisted households
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.
Instead of dividing families into schedules depending upon income, the housing authority will simplify the process and put

all on a 3 year re-exam period.

The housing authority is requesting to conduct interims only if income decreased by greater than 20% rather than just 10%. This would encourage self sufficiency in the family and reduce the administrative burden of conducting interims.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

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

No

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

Yes

What considerations led the MTW agency to modify the hardship policy?

Due to the change in family reexaminations to every 3 years. The RHA has decided that a family composition change, which is required to report, includes when a child turns 18.

How many hardship requests have been received associated with this activity in the past year?

14.00

How many hardship requests were approved?

8

How many hardship requests were denied?

6

How many are pending?

0

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

No

Does the MTW activity require an impact analysis?

Provided Already

What is the recertification schedule?

Once every three years

How many interim recertifications per year may a household request?

1

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

The family is required to report changes in family composition. A change for family composition is not counted against the 1 interim requirement.

5.d. - Alternative Inspection Schedule (HCV)

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

Some families will qualify for a triennial inspection only if the family has passed their initial 1 year inspection and first biennial inspection on the first visit. This will only be applicable if no tenant based deficiencies.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

Reduces the amount of inspections required each year.

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

No

10.a.HCV - Waive Operating a Required FSS Program (HCV)

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

The housing authority no longer has a FSS required number. Therefore the RHA eliminated the FSS program. The housing authority is very small and does not have the staff to continue this program currently when not required to.

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

Cost effectiveness

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

The lack of an FSS program allowed administrative resources to be used elsewhere.

Does this MTW activity require a hardship policy?

No

No document is attached.

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

No

Does the MTW activity require an impact analysis?

No

No document is attached.

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

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</p> <p>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p>No Agency-Specific Waivers are being requested.</p>
E.2	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>Does the MTW agency have any approved Agency-Specific Waivers?</p> <p>MTW Agency does not have approved Agency-Specific Waivers</p>

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
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G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
	80%-50% Area Median Income	
	49%-30% Area Median Income	
	Below 30% Area Median Income	
	Total Local, Non-Traditional Households	0

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

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

G.3	Substantially the Same (STS) – Local, Non-Traditional.	
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	# 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.	# 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	
2 Person	
3 Person	
4 Person	
5 Person	
6+ Person	
Totals	0

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

I.	Evaluations.
	No known evaluations.

MTW CERTIFICATIONS OF COMPLIANCE**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING****Certifications of Compliance with Regulations:
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (10/01/2023), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

Rosenberg Housing Authority
MTW PHA NAME

TX483
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).

Larry Wilkinson
NAME OF AUTHORIZED OFFICIAL

Chairman
TITLE

Larry Wilkinson
SIGNATURE

7-17-23
DATE

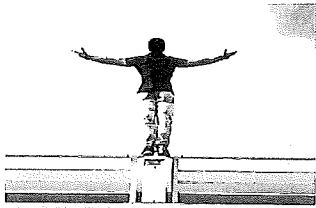
* *Must be signed by either the Chairperson or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws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

MTW WAIVERS YR 3

Proposed Changes to the HCV program (Rosenberg Housing Authority)

3/21/2022

Waivers being proposed



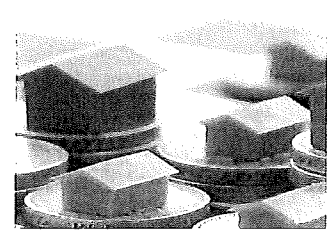
Rent Calculation



Payment Standards



Interim Policy Change



Re-exam Change

Rent Calculation



The RHA is proposing to keep rent calculation based upon annualized future income instead of actual income from the previous year. Deductions and Allowances will remain the same as they have been counted previously. Elderly/Disabled at \$400 and Dependent Allowance at \$480.

Payment Standards



Currently, the RHA has only 1 payment standard for all Fort Bend County. The RHA proposes to group zip codes and create at least 2 payment standards for Fort Bend County in order to allow families more choice outside the local Rosenberg/Richmond Area..

Interim Policy Change



Currently, there is only 1 interim decrease per year if the total income of the family decreases by 10%.

The RHA proposes to change the 1 interim decrease per year if the total income of the family decreases by more than 20%. A Hardship policy is available for certain situations outside of the family's control.

No Interims will be conducted 4 months before the Re-exam. Any change in income will be captured at the re-exam

Re-exam Change



Currently, Re-exams are conducted every 1-3 years depending upon the source of income of the family.

The RHA is proposing to conduct all re-exams on a 3 year re-exam schedule.

HCV Participant Comments

The housing authority values your opinion on the changes we plan to make in 2023. Please be honest in your opinions. Your opinions have no effect or bearing on your housing assistance.

1. Rent Calculation continuing as before based upon annualized income.

I like the way it is. It makes life a lot easier being a single mother trying to provide.

2. Payment standards will be based on grouped zip codes according to Small Area Fair Market Rents

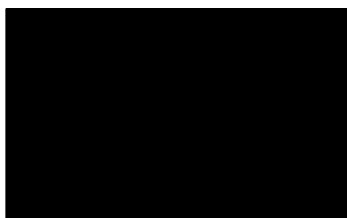
Anything beats paying full rent when your a single parent.

3. Interim Policy Change

Quick + easy not a hassle

4. Re-exam Policy

Quick + easy not an hassle



5/4/23
Date

HCV Participant Comments

The housing authority values your opinion on the changes we plan to make in 2023. Please be honest in your opinions. Your opinions have no effect or bearing on your housing assistance.

1. Rent Calculation continuing as before based upon annualized income.

I love how the rent is currently being calculated as it makes a way of living much easier, safe, and comfortable.

2. Payment standards will be based on grouped zip codes according to Small Area Fair Market Rents

This may be a good idea! I believe with further information it will allow others to find more suitable housing.

3. Interim Policy Change

I like what the policies are currently.

4. Re-exam Policy

coming in every 2 years for a re-exam because I work is the best. Please keep this policy.

Name

5.4.2023
Date

HCV Participant Comments

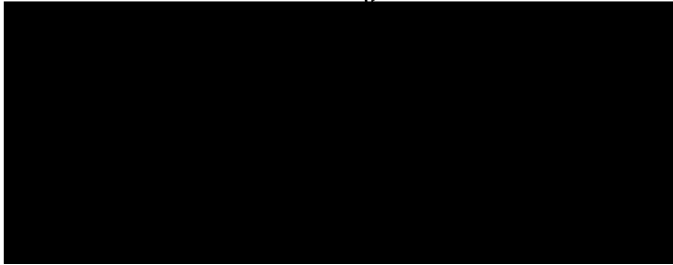
The housing authority values your opinion on the changes we plan to make in 2023. Please be honest in your opinions. Your opinions have no effect or bearing on your housing assistance.

1. Payment standards will be based on grouped zip codes according to Small Area Fair Market Rents

Good idea also, because some people need help in different Richmond/Rosenberg area, cause some areas are well off with people with that have ^{wonderful} good houses and apartments.

2. Interim Policy Change

Changing the policy would be a great idea because it would help people and also Rosenberg Housing Authority.



4/9/23

Date

HCV Participant Comments

The housing authority values your opinion on the changes we plan to make in 2023. Please be honest in your opinions. Your opinions have no effect or bearing on your housing assistance.

1. Payment standards will be based on grouped zip codes according to Small Area Fair Market Rents

Agreed, I have been in my complex 7 yrs. due to the rent & income. Having a bigger variety would be good.

2. Interim Policy Change

I would also agree with it. I have had some financial hardships in between jobs and in those moments being stuck with still paying rent with no income is difficult. This would be beneficial.

Name

Date

04/04/23

HCV Participant Comments

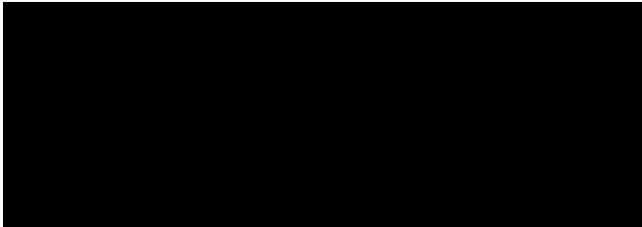
The housing authority values your opinion on the changes we plan to make in 2023. Please be honest in your opinions. Your opinions have no effect or bearing on your housing assistance.

1. Payment standards will be based on grouped zip codes according to Small Area Fair Market Rents

Yes

2. Interim Policy Change

Only 1 is allowed once a year



4-4-23

Date

HCV Participant Comments

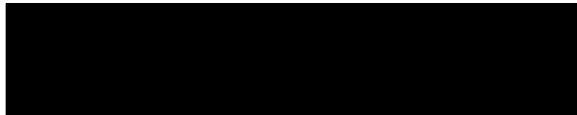
The housing authority values your opinion on the changes we plan to make in 2023. Please be honest in your opinions. Your opinions have no effect or bearing on your housing assistance.

1. Payment standards will be based on grouped zip codes according to Small Area Fair Market Rents

Yes it will help when looking for units

2. Interim Policy Change

Yes ~~the~~ change that because families like me has some changes throughout the year



Name

4-4-23

Date

HCV Participant Comments

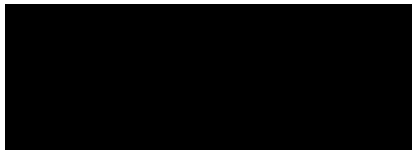
The housing authority values your opinion on the changes we plan to make in 2023. Please be honest in your opinions. Your opinions have no effect or bearing on your housing assistance.

1. Payment standards will be based on grouped zip codes according to Small Area Fair Market Rents

if its going To make it better
for family's Then yes

2. Interim Policy Change

if it will make it better Then yes
but if not leave it like it is



4/3/2023
Date



May 8, 2023

To Whom It May Concern:

Thank you for your participation in commenting on the changes to the housing assistance program that the RHA plans to implement next year.

Page 2 of this letter is meant to address and clarify your comments regarding the proposed changes.

Sincerely,

Kimberly Brown
Executive Director

**MTW WAIVERS – YEAR 3
RESPONSE TO PUBLIC COMMENT**

Rent calculation will be based on 30% of adjusted annualized future income with the regular \$480 dependent deduction and \$400 elderly deduction

HUD is proposing new changes to the way in which rent is being calculated for 2023. The RHA is requesting that the rent calculation remain as 30% of annualized adjusted income projecting forward and that the \$400 and \$480 deductions remain the same. This will result in a reduced administrative burden resulting in the learning curve of a new rent calculation as well as hopefully being able to update HUD's new HIP system with the waivers that the housing authority has been implementing since 2021.

Payment Standards will be based upon grouped zip codes

This change will result in the reduction of the concentration of the participants in the local 77471 zip code and allow for more mobility in all of Fort Bend Co.

Interim Policy Change

The interim policy and hardship policy will remain the same, however, the housing authority is proposing to conduct changes only if the family income decreases greater than 20%.

Re-exam Schedules

The Re-exam schedule for all participants will change to 3 years. The 3 year schedule will be based upon 3 years from your last re-exam since the housing authority had already staggered the re-exams for the last 2 years it has been an MTW agency.

Hardship Policy - 2nd 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 (includes a child that turned 18), the loss of income cannot be replaced (Child Support, Social Security), disability related, income decreased 20% or more, and the loss is through no fault of their own.

Hardship Policy 1.h. – Tenant Payment as a Modified Percentage of Income (HCV)

In order to qualify for a hardship exemption, households must meet all of the criteria listed below:

1. The household is in compliance with all the program rules and regulations.
2. The household does not owe RHA any money or is current with a re-payment agreement.
3. The household must be admitted to the program prior to October 1, 2023.
4. The household must experience an increase of greater than \$50 as a direct result of the MTW rent reform initiatives.
5. The household must request the hardship waiver within 10 business days from the date of the letter notifying them of change and giving the timeline in which to request an Informal Hearing or hardship review.
6. The household has not received a rent reform hardship relief for Tenant Payment at previous annual recertification.
7. The household must not be elderly or disabled.

Hardship relief for households who qualify and receive wavier approval may pay their portion of rent based on the calculation under the 30% of monthly adjusted income plus \$50 rather than the modified percentage of gross income until their next reexamination / recertification or relocation. At the next reexamination / recertification, or relocation, whichever comes first, the household will automatically be subject to the tenant payment set by RHA at that time.

Each household is only eligible for one term of relief for the Tenant Payment initiative.

Activity	Activity 2.a. Payment Standards-Small Area Fair Market Rents (SAMFR) (HCV) Delayed implementation
Fiscal Year	FY 2023
Program	Voucher Program (HCV)
1. Impact on the agency’s finances	In order for RHA to maximize the number of families served, maintaining affordable income to housing cost burdens overall, ensuring good housing quality stock and providing opportunities to lease in opportunity areas, utilizing SAFMRs as the basis for RHA’s payment standards within the 80% to 150% range, in conjunction with its “rent reasonableness” system is intended to help achieve these goals. Over time, the use of SAFMR-based payment standards that are more finely calibrated to submarkets within RHA’s service area, will result in relatively greater HAP expenditures in some areas and relatively lower HAP expenditures in other areas, with modest HAP cost increases over time as more voucher-assisted households choose to live in relatively higher cost areas made more accessible by SAFMR-based payment standards.
2. Impact on the affordability of housing costs for affected families	Improved affordability
3. Impact on the agency’s waitlist(s)	Over time, this activity is intended to enable RHA to serve more eligible households from its waiting list by maximizing the use of limited Federal HAP funding efficiently and effectively, but also by helping some families to become self-sufficient from the voucher program.
4. Impact on the agency’s termination rate of families	None
5. Impact on the agency’s current utilization rate in the HCV program	None
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency and/or housing choice	This activity increases RHA’s ability to meet the statutory goals of housing choice and self-sufficiency. This activity will allow RHA to adopt and implement a reasonable policy to establish payment standards based upon applicable Small Area Fair Market Rents (SAFMRs). RHA may use this flexibility to establish payment standards for grouped ZIP code areas between 80% and 150% of the applicable SAFMRs, based on a range of voucher programmatic outcomes, private market unassisted rents, census data, etc., or may establish payment standards for each ZIP code within its

	<p>jurisdiction. Among the geographic considerations in grouping SAFMRs, RHA is considering grouping the following ZIP codes in Fort Bend County: 77423, 77494, 77450, 77406, 77407, 77083, 77498, 77099, 77479, 77478, 77477, 77489, 77085, 77053, 77545, 77459, and 77479. In addition to Rosenberg, RHA operates is voucher program in Fort Bend County under an intergovernmental agreement with Fort Bend County.</p> <p>This activity will increase the RHA’s ability to encourage self-sufficiency and increase housing choices for HCV participants by utilizing Small Area Fair Market Rent (SAFMR) payment standards. RHA will increase housing choices for HCV participants to live in areas of opportunity based on Payment Standards between 80% and 150% of the SAFMRs.</p>
<p>7. Impact on the agency’s ability to meet MTW statutory requirements</p>	<p>None</p>
<p>8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity</p>	<p>None</p>
<p>9. Impact on protected classes (and any disparate impact)</p>	<p>This activity should have no disparate impact on protected classes.</p>

This would cost the housing authority \$1,803 per month with a total for the year of \$26,725.

**Housing Authority of the City of Rosenberg
Housing Choice Voucher Program
Exception Payment Standards
(Effective January 1, 2024)**

ZIP Codes	0BR	1BR	2BR	3BR	4BR	5BR
77464						
77476						
77485	\$ 1,056	\$ 1,215	\$ 1,440	\$ 1,920	\$ 2,445	\$ 2,811
77083						
77417						
77423						
77430						
77435						
77441						
77444						
77451						
77461						
77469						
77471						
77583	\$ 1,056	\$ 1,335	\$ 1,545	\$ 1,993	\$ 2,632	\$ 3,027
77053						
77085						
77089						
77420						
77447						
77459						
77478						
77479						
77481						
77584	\$ 1,330	\$ 1,650	\$ 1,960	\$ 2,528	\$ 3,339	\$ 3,840
77449						
77477	\$ 1,499	\$ 1,949	\$ 2,208	\$ 2,848	\$ 3,761	\$ 4,326
77406						
77407						
77450						
77489						
77493						
77494						
77498						
77545	\$ 1,639	\$ 2,025	\$ 2,415	\$ 3,115	\$ 4,110	\$ 4,726

Payment Standards are used to calculate the maximum amount of Housing Assistance Payments that the Rosenberg Housing Authority (RHA) is authorized to pay for the family. Payment Standards do not determine the amount of contract rent to the property owner. Payment Standards are used to calculate the maximum amount of Housing Assistance Payments (HAP) otherwise known as rent subsidy payments that RHA is authorized to pay on behalf of voucher-assisted households after also factoring 30 percent of their monthly adjusted income and tenant-paid utility allowances.

The amount of gross rent that RHA may offer a property owner is governed by HUD's rent reasonableness regulations [24 CFR 982.507(4)] under which HADB considers: the location size unit type quality and age of the contract unit; as well as any amenities housing services maintenance and utilities to be provided by the owner in accordance with the lease. RHA's rent reasonableness process includes comparable rents being charged for similar units unassisted dwelling units in the area of the subject property. Reasonable rents must also not exceed rents charged for comparable unassisted units in which tenants have lived for approximately the same amount of time. Reasonable rents also factor in the amount of RHA's tenant-paid utility allowances.

Upon initially leasing a dwelling unit a voucher-assisted participant cannot pay more than 45% of their adjusted gross income for rent and tenant-paid utility (allowances). If the rent plus utility allowance cost is at or below these Payment Standards the participant will only pay 30% of their adjusted gross income and the 45% figure would not apply.