PHA Name: Ruston

PHA Code: LA054
MTW Supplement for PHA Fiscal Year Beginning: (MM/DD/YYYY): 7/1/2022
PHA Program Type: Public Housing (PH) only
MTW Cohort Number: 1
MTW Supplement Submission Type: Annual Submission
B. MTW Supplement Narrative.

The Ruston Housing Authority (RHA) is located in Ruston, Louisiana, and serves eligible low-income families, veterans, the elderly, and persons with disabilities in the Ruston, Farmerville, and Gibsland areas. The Public Housing Program has been assisting residents in a compassionate and accountable manner since 1957. The same quality of service was extended to residents in Farmerville, Louisiana, as the RHA began administering the public housing program at the Farmerville Housing Authority in 1999 and the Gibsland Housing Authority in 2020. The RHA is dedicated to improving the lives of its residents by providing affordable housing that is safe and decent, with opportunities for advancement through culture, education, and employment to all qualifying persons regardless of race, color, religion, sex, national origin, disability, and familial status. The RHA is committed to operating in an efficient, ethical, and professional manner.

The vision of RHA's Moving to Work (MTW) program is to achieve maximum operating efficacy while simultaneously, enriching the lives of its families. Through the MTW program the RHA will utilize the "hand up" approach to support families and RHA in achieving a greater cost effectiveness in the use of federal resources, in assisting families on the road to self-sufficiency, and in expanding affordable housing choices for families.

RHA defines self-sufficiency as the ability of households to successfully graduate from public housing to either fair-market rental or homeownership.

RHA will implement the mandatory "STEPPING STONE" program for all Non-Elderly or Non-disabled families, with the educational, social, financial and career tools needed to successfully graduate from public housing. However the program will be available to all residents who would like to voluntarily enter the program.

RHA will enlist the services of a MTW Coordinator to manage the STEPPING STONE program. The MTW Coordinator will ensure residents understand their obligations in the program and help residents realize their true potential.

The STEPPING STONE program is the first effort by the RHA to improve resident well-being as an MTW agency. The RHA will modify, improve and/or discontinue its MTW programming as he agency learns from experience and resident feedback year after year.

There are several MTW policies that will be implemented by RHA, as soon as the new PIC-NG (HIP) system is operational, such as, Stepped Rent, Elimination of deductions, Alternative Reexamination Schedules. RHA is working closely with its software provider to ensure a seamless transition.
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).

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

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<tr>
<th>1. Stepped Rent (PH)</th>
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A stepped rent in conjunction with a minimum rent will be instituted for eligible households (non-elderly and non-disabled) in the STEPPINGSTONE program. Every two years, at recertification, households will be subject to a set rent increase in preparation for program graduation. The RHA will make all necessary referrals to partner organizations to support households preparing for the termination of their assistance.

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

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

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

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

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

Implementation of this policy has not occurred yet, due to the delay in revisions of PIC-NG (HIP) by HUD. Once HUD has completed revisions, then our software provider will upgrade our software to accommodate the changes. It is unclear when
HUD will have the revisions completed.

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, Ruston 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.

Year 1: Rent determination is 20% of gross income or the minimum rent, whichever is greater.
Year 3: Rent determination is 20% of gross income plus a 4% increase of Fair Market Rent or minimum rent, whichever is greater.
Year 5: Rent determination is 25% of gross income plus a 4% increase of Fair Market Rent or minimum rent, whichever is greater.
Year 7: Rent determination is 32% of gross income plus a 4% increase of Fair Market Rent or minimum rent, whichever is greater.
Please see the attached stepped rent schedule.

If a household progresses all the way through the stepped rent schedule, Other\Not Applicable.

By year 7 households will have reached Term-Limits of Assistance and will no longer be eligible for housing.

1.e. - Minimum Rent (PH)

The RHA is committed to preparing its residents for self-sufficiency and program graduation. A minimum rent in conjunction with a stepped rent will be instituted for eligible households (non-elderly and non-disabled) in the STEPPINGSTONE program. The minimum rent for these households will increase from $50 to $130 per month.

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

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

The increase of minimum rent was implemented on November 1, 2021 for new applicants and at recertification on existing tenants. Although the Stepped Rent policy was not implemented at that time due to delay in the revision of PIC-NG (HIP) by HUD.

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, Ruston 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.

1.r. - Elimination of Deduction(s) (PH)

Through the STEPPINGSTONE program for non-elderly and non-disabled households, the RHA will eliminate deductions and the standard rent based on adjusted income. The total tenant payment (TTP) will be calculated based on gross income. Additionally, a minimum rent in conjunction with a stepped rent will be instituted for eligible households.

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

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

minimum rent or minimum Total Tenant Payment (TTP) - $130
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households.

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

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

The Elimination of Deductions policy has not been implemented, due to the delay in the revision of PIC-NG (HIP) by HUD. Our software provider is unable to upgrade the software to accommodate these changes until HUD completes their revision.

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, Ruston 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

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

All RHA public housing households will experience a new timeline of income recertifications. Households eligible for the STEPPINGSTONE program (non-elderly and non-disabled) will be scheduled for recertifications once every two years. Households not eligible for the STEPPINGSTONE program (elderly and/or disabled) will be scheduled for recertification once every three years. Households that choose a flat rent will also receive either a biennial or triennial recertification based on their household status (non-elderly and non-disabled or elderly and/or disabled). Interim income increases, in both categories of households, will be disregarded until the next scheduled recertification. Interim recertifications will be limited to one interim per calendar year and will be processed at the request of the household.

Households that are experiencing a financial hardship and have already used the interim adjustment may request an additional adjustment as outlined in the RHA hardship policy. This is granted at the discretion of the RHA after a written demonstration of need is received.

The purpose of the alternative recertification schedule is to incentivize and reward residents, who have realized an increase in earnings, to retain those earnings without penalty of an increase in rent. Additionally, it will reduce the administrative burden on staff.

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

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

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

The Alternative Reexamination Schedule has not been implemented, due to the delay in the revisions to the PIC-NG (HIP) by HUD. Once the revisions are completed then our software provider will be able to upgrade our software to accommodate these changes.

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, Ruston MTW agency received 0 hardship requests.
Approved hardship requests
Denied hardship requests
There is/are hardship requests pending.

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

Recertification Schedule is Other
Once every two years for non-elderly and non-disabled households.
Once every three years for elderly and/or disabled households.

Household may request 1 interim recertifications per year.
Interim recertifications for household composition changes will not count against the limit on voluntary interim recertifications.

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<tr>
<th>3.c. - Self-Certification of Assets (PH)</th>
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<tr>
<td>The asset self-certification ceiling will be increased from $5,000 to $50,000. This will lessen the regulatory responsibilities of the RHA.</td>
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<tr>
<td>From the implementation date of November 1, 2021, until the date of this report, under this activity, Ruston MTW agency received 0 request for self-certification of assets, or hardship request.</td>
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<tr>
<td>No hardship were requested in the most recent fiscal year.</td>
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<tr>
<td>In the prior year, under this activity, Ruston MTW agency</td>
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<td>Received 0 hardship requests</td>
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<td>There is/are hardship requests pending.</td>
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<tr>
<td>The dollar threshold for the self-certification of assets is $50,000.</td>
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<tr>
<th>7.a. - Term-Limited Assistance (PH)</th>
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<tr>
<td>All households of the STEPPINGSTONE program (non-elderly and non-disabled) will be subject to a time-limited housing term of five (5) years. Households requiring additional time to exit the public housing program may apply for a one (1) year extension. Extension requests will be granted by RHA, at its discretion, following the completion of a households fiver year term limit.</td>
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<td>The one-year extension can be applied for and granted a maximum of two (2) times. The absolute household term-limit is seven years. Households that reach seven years of tenancy, regardless of consecutiveness, with the RHA are unable to reapply for the public housing program.</td>
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<td>Supportive services will be offered to households as they transition off of the program.</td>
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<td>This MTW activity serves the following statutory objectives:</td>
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An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).

The MTW activity applies only to selected family types

The five year term limit activity began to be implemented on November 1, 2021, with new households and at recertification of current households. The earliest end date of term limits will be November 1, 2026 for the first group of households. The STEPPINGSTONE program will provide educational activities, in collaboration with its partners, to provide support to households as they prepare to graduate from public housing.

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, Ruston 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 following is how households will be supported to prepare for the end of assistance:The STEPPINGSTONE program, in collaboration with partners, will provide educational classes and training, in the areas of health, personal finance, GED, career /employment.

208 households are currently subject to this policy.

**11.a.PH - Alternative Family Selection Procedures (PH)**

The RHA will implement the "STEPPINGSTONE" program with the purpose of educating and empowering tenants with the tools needed to achieve self-sufficiency, which the RHA defines as the ability to maintain nonsubsidized housing for at least 12 months. The program will graduate tenants from public housing to sustainable self-sufficiency.

All non-elderly and non-disabled tenants must participate in the STEPPINGSTONE program as a condition of tenancy. Disabled tenants are not required to participate, but can voluntarily take part in all program offerings. The requirements and expectations of the program will be clearly presented to the tenant upon move-in or at the program’s inception for current tenants. The tenant will be required to sign an explanatory contract and agree to the requirements and expectations.

All tenants of the program will be required to meet with the MTW Coordinator/staff or a mutually agreed upon community partner of the RHA at least once every six months to discuss program progress. The required conversations between staff and tenants will also serve to better educate the RHA on the needs of the community and possible resources/organizational partners that could better assist tenants on their path to self-sufficiency.

Additionally, all tenants of the STEPPINGSTONE program must participate in prescribed educational opportunities:

1. Budgeting/personal finance class (possible community partner: BancorpSouth CCR Program or Real Change in Ruston)
2. Family assets for independence class (possible community partner: BancorpSouth CCR Program or Real Change in Ruston)
3. Homeownership or fair market rental classes depending on the preferences of the tenant
4. Additional check-ins with RHA staff and community partners as appropriate for specific situations. All check-ins and educational components of the STEPPINGSTONE Program are mandatory and are a condition of tenancy.

All tenants in the program are granted "Three Strikes" on compliance. A tenant who fails to attend either without explanation or making other arrangements with the RHA, ahead of time, will receive a written warning. A second consecutive failure to attend without explanation will result in a lease violation. A third failure to attend could lead the RHA to pursue housing termination. If the RHA terminates tenancy of an eligible household for an alleged violation of the program, the tenant will be entitled to a hearing under the RHA's grievance procedure.

This MTW activity serves the following statutory objectives:

Cost effectiveness
Self-sufficiency

This MTW activity serves the following statutory objectives:

Increased revenue
Decreased expenditures

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

This MTW activity applies to:

New admissions and currently assisted households

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

Although it was RHA’s intentions to begin this activity November 1, 2021, we have delayed the implementation due the delay by HUD of the PIC-NG/HIP update. RHA is also in the process of hiring a MTW Coordinator and establishing the required classes that tenants will be required to attend.

No hardship were requested in the most recent fiscal year.

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

MTW Self-Sufficiency policy is mandatory for the following
The STEPPINGSTONE program will be mandatory for all residents of the RHA who are between the ages of 18 and 62, and are not legally designated as disabled according to the Social Security Act or other relevant legislation.

New residents who meet these criteria will sign a one-page lease addendum agreeing to the terms of the program at move-in. At that time, they will also schedule their first meeting with the MTW Coordinator to understand the STEPPINGSTONE program and discuss any concerns or questions.

11.b.PH - Policies for Addressing Increases in Family Income (PH)

The RHA will implement the “STEPPINGSTONE” program with the purpose of educating and empowering tenants with the tools needed to achieve self-sufficiency, which the RHA defines as the ability to maintain nonsubsidized housing for at least 12 months. The program will graduate tenants from public housing to sustainable self-sufficiency. All non-elderly and non-disabled tenants must participate in the program as a condition of tenancy. Tenant income increases are recognized for the purpose of increasing rent consistent with the RHA’s STEPPINGSTONE program rent policy, which consists of a minimum rent in combination with a stepped rent. (See RHA Waivers #3 and #4)

The RHA will introduce a stepped rent based on gross income, an increased minimum rent, the elimination of deductions, and a work requirement. Income increases will be disregarded until the next scheduled recertification and phased in over a two-year period.

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

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

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

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

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

The MTW activity applies only to selected family types

This activity was scheduled to begin November 1, 2021, but the implementation has been delayed due to HUD’s delay in revising the PIC-NG/HIP system. Once HUD completes the update our software will be revised by our provider, enabling RHA to send out notices to the eligible tenants of the new implementation date.

No hardship were requested in the most recent fiscal year.

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

Following is the policy for the increased earnings for families participating in the MTW Self-Sufficiency program: Following is the policy for the increased earnings for families participating in the MTW Self-Sufficiency program: Income increases are recognized for the purpose of increasing rent consistent with the RHA’s STEPPINGSTONE program rent policy. The RHA will introduce a stepped rent based on gross income, an increased minimum rent, the elimination of deductions, and a work requirement. Income increases will be disregarded until the next scheduled recertification and phased in over a two-year period. In order to qualify for the income disregard, the increase in income must be reported within (30) days or retro-active rent may be applied. The earned income disregard applies to the following family members:
A family member whose earned income increases during a family self-sufficiency or other job training program; A family member who, during the previous (6) months, was assisted under any State Temporary Assistance to Needy Families Program (TANF); A family member who becomes employed after being unemployed for at least one year.

12.a. - Work Requirement (PH)

The RHA will implement a mandatory work requirement for all non-elderly and non-disabled individuals between the ages of 18 and 62. These individuals must work a minimum of 15 hours per week or the equivalent number of hours in one year (780 hours). The requirement applies to all eligible households, the maximum requirement will be 30 hours per week per household. Individuals that work less than 15 hours a week are required to do at least 8 hours of community service per month.

Eligible individuals will meet with the RHA staff to determine the best course of action, on an individual basis, to meet this activity’s ultimate goal of self-sufficiency. The RHA, at its discretion, will allow acceptable substitutes for employment, such as education or rehabilitation to fulfill this requirement.

The following individuals will be exempt from this activity: elderly and/or disabled individuals, individuals aged 18 years and younger, live-in aides, individuals that receive aid from the Supplemental Nutrition Assistance Program (SNAP), individuals that are the primary caretaker for a child under 6 years of age, and women who are pregnant.

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

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

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

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

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

RHA had schedule implementation of this activity for November 1, 2021, but has been delayed due to the delay by HUD in upgrading the PIC-NG/HIP system. Once HUD completes the upgrade, then our software will be upgraded by our provider, allowing us to send out notices to the tenants of the new implementation date.

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, Ruston 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.

In addition to elderly or disabled households, or elderly or disabled adult household members, the work requirement does not apply to the following:
- The following individuals will be exempt from this activity: elderly and/or disabled individuals, individuals aged 18 years and younger, live-in aides, individuals that receive aid from the Supplemental Nutrition Assistance Program (SNAP), individuals that are the primary caretaker for a child under 6 years of age, and women who are pregnant.

The following counts as work under this activity: Part-time, full time and seasonal employment.

The following is how will the MTW agency monitor compliance: The following is how will the MTW agency monitor compliance: Compliance will be monitored annually by the RHA through preschedule reviews. Compliance will also be monitored through the residents, as any changes to household income and/or composition must be reported to the RHA within 10 days.

The following supportive services are offered to support households: Supportive services will be offered through the RHA staff and/or a community partner of the RHA.

The following is how the agency address noncompliance with the work requirement policy: The following is how the agency address noncompliance with the work requirement policy: Residents will have 10 days to report non-compliance. If the lack of compliance is not due to a hardship, the RHA will issue a written warning and the
resident must gain employment within six months. The RHA will also refer the resident to one of RHA’s community partners for services, of which the resident must attend. The resident must check in monthly with the RHA regarding the progress of his/her job search. If in good faith the resident has not obtained employment in six months, the RHA will extend the job search for another 60 days. If the resident has not obtained employment in six months, has failed to check-in with the RHA, and has failed to participate in the employment services offered, the RHA will terminate the resident’s participation in the public housing program.
If the resident fails to give notice within 10 days, the resident will receive a “curable” deficiency notice from the RHA stating the resident’s non-compliance. Additionally, the letter will state the requirements for the resident, which includes finding employment within 90 days, checking in monthly with the RHA, and partaking in services with the RHA’s community partner. If in good faith the resident has not obtained employment in three months, the RHA will extend the job search for another 30 days. If the resident has not obtained employment in three months, has failed to check-in with the RHA, and has failed to participate in the employment services offered, the RHA will terminate the resident’s participation in the public housing program.
If the resident fails to give notice within 10 days, the resident will receive a “curable” deficiency notice from the RHA stating the resident’s non-compliance. If the resident completely disregards the “curable” deficiency notice, the RHA will terminate the resident’s participation in the public housing program.

| 208 households are currently subject to the policy. |

| 0 households were sanctioned for non-compliance with the work requirement in the most recently completed PHA fiscal year. |
D. Safe Harbor Waivers.

D.1 Safe Harbor Waivers seeking HUD Approval:
No Safe Harbor Waivers are being requested.

E. Agency-Specific Waiver(s).

E.1 Agency-Specific Waiver(s) for HUD Approval:
The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, Agency-Specific Waivers may be requested.

No Agency-Specific Waivers are being requested.

E.2 Agency-Specific Waiver(s) for which HUD Approval has been Received:
MTW Agency does not have approved Agency-Specific Waivers

F. Public Housing Operating Subsidy Grant Reporting.

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

<table>
<thead>
<tr>
<th>Federal Fiscal Year (FFY)</th>
<th>Total Operating Subsidy Authorized Amount</th>
<th>How Much PHA Disbursed by the 9/30 Reporting Period</th>
<th>Remaining Not Yet Disbursed</th>
<th>Deadline</th>
</tr>
</thead>
<tbody>
<tr>
<td>2021</td>
<td>$1,031,404</td>
<td>$257,850</td>
<td>$773,553</td>
<td>2029-06-30</td>
</tr>
<tr>
<td>2022</td>
<td>$1,067,426</td>
<td>$0</td>
<td>$0</td>
<td>2030-06-30</td>
</tr>
</tbody>
</table>
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.

<table>
<thead>
<tr>
<th>Income Level</th>
<th>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</th>
</tr>
</thead>
<tbody>
<tr>
<td>80%-50% Area Median Income</td>
<td>0</td>
</tr>
<tr>
<td>49%-30% Area Median Income</td>
<td>0</td>
</tr>
<tr>
<td>Below 30% Area Median Income</td>
<td>0</td>
</tr>
<tr>
<td>Total Local, Non-Traditional Households</td>
<td>0</td>
</tr>
</tbody>
</table>

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

G.2 Establishing Reasonable Rent Policy.

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

G.3 Substantially the Same (STS) – Local, Non-Traditional.

The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.

0 # of unit months

The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.

0 # of unit months

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

<table>
<thead>
<tr>
<th>PROPERTY NAME/ADDRESS</th>
<th>TOTAL UNITS</th>
<th>POPULATION TYPE*</th>
<th>if 'Population Type' is Other</th>
<th># of Section 504 Accessible (Mobility)**</th>
<th># of Section 504 Accessible (Hearing/Vision)</th>
<th>Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?</th>
<th>What was the Total Amount of MTW Funds Invested into the Property?</th>
</tr>
</thead>
<tbody>
<tr>
<td>0/1 BR</td>
<td>2 BR</td>
<td>3 BR</td>
<td>4 BR</td>
<td>5 BR</td>
<td>6+ BR</td>
<td>TOTAL UNITS</td>
<td>POPULATION TYPE*</td>
</tr>
</tbody>
</table>

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.
## 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

## Evaluations

Yes - This table lists evaluations of Ruston's MTW activities, including the names of evaluators and available reports

### Table I.1 - Evaluations of MTW Policies

<table>
<thead>
<tr>
<th>Title and short description</th>
<th>Evaluator name and contact information</th>
<th>Time period</th>
<th>Reports available</th>
</tr>
</thead>
<tbody>
<tr>
<td>MTW Expansion Cohort #1 Evaluation</td>
<td>Abt Associates, Social and Economic Policy Division 6130 Executive Blvd. Rockville, MD 20852</td>
<td>2020-2022</td>
<td>None that the PHA is aware of at this time.</td>
</tr>
</tbody>
</table>
# FY2022 Ruston Housing Authority Stepped Rent

<table>
<thead>
<tr>
<th>Year of Residency</th>
<th>Rent Determination</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>20% of gross income or the minimum rent, whichever is greater</td>
</tr>
<tr>
<td>3</td>
<td>20% of gross income plus a 4% increase of Fair Market Rent (FMR)</td>
</tr>
<tr>
<td>5</td>
<td>25% of gross income plus a 4% increase of Fair Market Rent (FMR)</td>
</tr>
<tr>
<td>7</td>
<td>32% of gross income plus a 4% increase of Fair Market Rent (FMR)</td>
</tr>
</tbody>
</table>
FY22 RHA Impact Analysis Activity 8
Term-Limited Assistance

1. **Impact on the agency’s finances (e.g., how much will the activity cost, any change in the agency’s per family contribution)**
   The RHA will implement term-limited assistance for families in the STEPPINGSTONE program (non-elderly and non-disabled households). This program will allow the RHA to continually assist low-income families on a revolving basis. The work requirement along with a joint stepped and minimum rent all work in harmony to make term-limited assistance feasible for eligible families. This program will gradually increase the tenant rent, which will increase the revenue for the RHA.

2. **Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)**
   The STEPPINGSTONE program gives families up to seven years to prepare for non-subsidized housing, and includes term-limited assistance, a work requirement, and a combined stepped and minimum rent. Each facet of the program works in accord to increase the income of eligible families and achieve self-sufficiency (program graduation). Tenant rent will increase every two years, and families will be able to afford these increases with their increased earnings.

3. **Impact on the agency’s waitlist(s) (e.g., any change in the amount of time families are on the waitlist)**
   This activity will not affect the waiting list.

4. **Impact on the agency’s termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)**
   This activity will not affect the termination rate of families.

5. **Impact on the agency’s current occupancy level in public housing and utilization rate in the HCV program**
   This activity will not affect the agency’s current occupancy level in public housing.

6. **Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice**
   **MTW Statutory Objective - Cost Effectiveness**
   This waiver will increase the cost effectiveness of program operations over time. As families graduate from the program and new families join the program, the RHA will be able to better manage funds creating a steady ebb and flow of financials.

   **MTW Statutory Objective – Self Sufficiency**
   This waiver will increase self-sufficiency by setting an achievable goal of financial independence for families.

7. **Impact on the agency’s ability to meet the MTW statutory requirements**
   The RHA will be able to meet the statutory objectives of Cost Effectiveness and Self-Sufficiency.

8. **Impact on the rate of hardship requests and the number granted and denied as a result of this activity**
   The RHA does not anticipate the number of hardship requests increasing due to the implementation of this waiver. The RHA has an all-encompassing program of supportive services to mitigate such hardships should they arise.

9. **Across the other factors above, the impact on protected classes (and any associated disparate impact)**
   This activity is based on tenure, in which protected class is not a factor, and there is no anticipated impact on protected classes.
The Ruston Housing Authority (RHA) has established a hardship policy to evaluate individual circumstances to address hardship exemption requests.

Applicable Family Situations
Qualifying hardships include the following:

1. The family has experienced a decrease in income because of changed circumstances including,
   a. Involuntary loss or reduction of employment
   b. Death in the family
   c. Involuntary reduction in or loss of earnings or other assistance

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

Process for Agency Review and Determination
When a resident requests a hardship exemption from an MTW activity the RHA will take the following actions:

1. Suspend the MTW activity beginning the next month after the request until the agency has determined if the request is warranted.
2. Determine whether a hardship exists within a reasonable time after the family request and whether it is temporary or long term.
3. The RHA will not evict the family during the 90-day period beginning the month following the family's request for a hardship exemption.
4. If it is determined that a financial or other hardship exists and is TEMPORARY, the RHA will continue providing an exemption from the MTW activity at a reasonable level for up to 90 days. After that time, the RHA will reinstate the MTW activity from the beginning of the suspension.
5. Temporary Rent Hardship: If the RHA has determined that a family is experiencing a temporary rent hardship, the RHA will reduce the family’s rent to $50 per month for up to 90 days. The family is not obligated to repay the amount of back rent owed to the RHA. After that time, the RHA will reinstate the family’s preexisting rent.
6. If it is determined that a financial or other hardship exists and is LONG-TERM, the RHA will continue providing an exemption from the MTW activity at a reasonable level for a specified duration determined by the RHA. After that time, the RHA will reinstate the MTW activity from the beginning of the suspension. The RHA will offer the family a reasonable repayment agreement on terms and conditions established by the RHA for the amount of back rent owed by the family.
7. If it is determined that a financial or other hardship request did not meet hardship standards, the resident must resume the MTW activity and collect any retroactive rent, if applicable, through a reasonable repayment agreement.

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

Grievance Procedure
If a family’s hardship request is denied, the family is permitted to go before the Hearing Panel for a second review.

Reasonable Accommodations
The RHA will address persons with handicaps requesting a reasonable accommodation under 24 CFR part 8 through the RHA’s Reasonable Accommodations Policy and procedures.

Record Keeping
The RHA will keep clear records for hardship requests and determinations for five (5) years. These records are available for public review and inspection at the RHA’s principal office during normal business hours and supplied to HUD if requested.
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 (01/07/2022) hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

(1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.

(2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.

(3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075-1 (or successor form as required by HUD).


(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(a) 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.


(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.

RUSTON HOUSING AUTHORITY

MTW PHA NAME

I hereby certify that all the information stated herein, as well as any information provided in the accompany 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).

ROBERT WILEY
NAME OF AUTHORIZED OFFICIAL

[Signature]

CHAIRMAN
TITLE

5/12/2022
DATE

* Must be signed by either the Chairperson or Secretary of the Board of the MTW PHA’s legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.
PUBLIC HEARING: February 28, 2022 @ 4:00PM

MOVING TO WORK SUPPLEMENTAL PLAN

PUBLIC HEARING COMMENTS:

No comments.

No residents were in attendance.
SIGN IN SHEET

PUBLIC HEARING:
Topics:
- 2023 Operating Budget
- 2022 – 2027 Capital Fund Program
- 2022 – 2027 Environmental Review
- 5-Year/Annual PHA Plan
- Moving-to-Work Supplemental Plan Agency Plan

Location: 615 N. Farmerville Street
Date: February 28, 2022  Time: 4:00PM

ATTENDEES:

NAME  PHONE  EMAIL

[Signature]

[Signature]

NO ATTENDEES
NOTICE OF PUBLIC HEARING

The Ruston Housing Authority is developing its 2023 Operating Budget, 2022 Capital Fund Program; 2022 Environmental Review; the 5-Year/Annual PHA Plan and the Moving-to-Work Supplemental Plan in compliance with the Quality Housing and Work Responsibility Act of 1998. It is available for review at the Housing Authority’s Office located at 615 North Farmerville Street, Ruston, Louisiana. The Housing Authority’s hours of operation are 8:00AM to 5:00PM. In addition, a Public Hearing will be held on, Monday, February 28, 2022 at the Housing Authority’s office at 4:00PM. Everyone is invited.

SUBMIT TO NEWSPAPER FOR PUBLICATION NO LATER THAN
JAN 10, 2022
raced 1-5-22