PHA Name: Sheffield

PHA Code: AL068
MTW Supplement for PHA Fiscal Year Beginning: (MM/DD/YYYY): 4/1/2021
PHA Program Type: Combined
MTW Cohort Number: 1
MTW Supplement Submission Type: Annual Submission
Sheffield Housing Authority (SHA) plans to use its MTW status to create a comprehensive program that will offer encouragement in the form of incentives to help families work toward self-sufficiency and homeownership; provide assistance to the elderly/disabled to help them age in-place comfortably; and establish emergency or transitional services to the homeless or otherwise hard-to-house. Because MTW does not provide additional funds to meet these goals, SHA must find cost-effective measures to allow staff time and resources to put the needed social services into place, and must use our funding fungibility to improve and add to the housing choice.

Plan for Sheffield Housing Authority’s MTW Program:

1. **Utility Reimbursements:**
   - SHA will eliminate utility reimbursements for both PH & HCV when the utility allowance is greater than the total tenant payment. This calculation will be applied first to new tenants and then to existing tenants at their reexamination one full year after implementation. This policy will not be applied to elderly/disabled households.
   - SHA spends an average of $15,000 per month on utility reimbursements. These savings will be directed to the Help-Your-Self (H.U.R.S.) program to pay salaries and to establish accounts to help with emergency expenses, such as transportation, childcare, utility payments, etc. Since the policy will be implemented slowly and will not apply to elderly/disabled households, full savings will not be apparent for some time.

2. **Alternate Income Inclusions/Exclusions for MTW households:**
   - $2,000 up-front medical deduction for working families. (Medical expenses in excess of this amount will be deducted at full value (no 3% of income). This is to help with insurance premiums, or with out-of-pocket medical expenses.
   - 10% earned income deduction for working families. This is to help with expenses associated with work, such as transportation expenses, uniforms, etc.
   - Out-of-pocket dependent care deductions. SHA will not pay more than the local rate established by the AL Dept. of Human Services for a licensed child-care facility.
   - These deductions are meant to incentivize working families by helping them see a positive economical outcome to working. This will be applied to all new tenants and to existing tenants at their next reexamination or at an interim if the tenant requests after being notified of the implementation of the policy.

3. **At reexamination, SHA will allow self-certification of assets up to $50,000 for both PH & HCV. This will save staff time.**

4. **Landlord Incentives- HCV Program:**
   - a. If a tenant breaks a lease, abandons the unit, or SHA terminates the assistance mid-lease term, the landlord will be entitled to a payment equal to one month's contract rent, when the unit is leased to another voucher holder.
   - b. If a tenant leaves a unit damaged, the amount of damage claims must not exceed the lesser of the cost of repairs or two months of contract rent, minus the security deposit. The video of the initial and/or most recent inspection will be used to verify damages at move-out. This will be paid when the unit is leased to another voucher holder.
   - c. SHA will pay incentives to landlords who lease a unit not previously on the program to a HCV tenant. The incentive will be no more than one month's rent or $500, whichever is less. The payment will be made when the HAP contract is executed. While these activities are not time or money savers, they will help to add properties to the HCV program and will help retain the units in the program. Most of all, these initiatives may improve the public perception of the HCV program and will encourage landlords to participate.

5. **Housing Quality Standards (HQS)**
   - SHA will allow pre-qualifying unit inspections; if the inspections have been conducted within 90 days of the participant occupying the unit; if a written copy of the inspection can be provided; if the inspection standards at 24 CFR 982.401 have been met; and if the tenant agrees that the inspection accurately represents the condition of the unit. Even if the tenant agrees to the use of a pre-existing inspection, the tenant may request an interim inspection at any time.

6. **Work Requirement for both PH and HCV:**
   - The Work Requirement mandates that all non-elderly/disabled, able-bodied adults age 18 and older work a minimum of 15 hours a week. For a two-adult household, the work requirement can be met if the adults in the family work a combination of 30 hours a week. The Work Requirement may be met by participation 15 hours a week in HURS, or by participation in a training or educational program, or community service. Participation in social services (HURS) is not required, but for new applicants who do not participate, they still must meet the Work Requirement within 6 months, or be given a termination of assistance notice, and their lease will not be renewed at annual reexamination. For current tenants who do not meet the work requirement, prior to implementation all residents shall be given notice six months in advance of the sanction policy for non-compliance. This policy does not apply to the elderly/disabled households or to a primary caretaker for a child under 6 years of age or pregnant, or to those who are exempt from Community Service but they will be...
given the chance to participate if they wish.

15. Acquisition without HUD approval; SHA’s Faircloth Limit is 412 units. In 2016, 16 units were demolished. 10 have been replaced, but SHA needs to acquire 6 more units. This waiver will allow SHA to be competitive in buying property. SHA understands that it must supply the following documentation to HUD within 30 days of acquisition: zoning permission, an appraisal, and an environmental assessment.

17c. Housing Development Programs

SHA will provide gap financing to our affiliate non-profit, Northwest Alabama Services (NWAHS) to buy, build, and or renovate units to be used by the non-profit as transitional housing for homeless families. NWAHS currently operates a day center for the homeless and has 2 units for emergency housing, but nothing for transitional housing for homeless/transitional housing for the homeless who are not ready for permanent housing. NWAHS will own and manage any such units and will provide the supportive housing necessary to assist the tenants to become eligible and ready for permanent housing. The use of SHA’s MTW funding and NWAHS’ funding together will allow NWAHS to purchase such properties immediately, as they become available in a very tight market. The families involved will all have income less than 80% of AMI. SHA will not spend more than 10% of its HAP budget on non-traditional activities. Because NWAHS is an affiliate of SHA, we believe competitive bidding should not be required, but AHA will do so if necessary.

SHA will also use MTW funding for administrative costs to implement a recent grant received from Congress to demolish, or buy & renovate derelict properties in the City of Sheffield. The renovated properties will be used as rental property or sold to any low-income (below 80% of AMI) family in Colbert County. No HAP funds will be used for this activity.
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).

<table>
<thead>
<tr>
<th>1. Tenant Rent Policies</th>
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<tbody>
<tr>
<td>a. Tiered Rent (PH)</td>
<td>Not Currently Implemented</td>
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<tr>
<td>b. Tiered Rent (HCV)</td>
<td>Not Currently Implemented</td>
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<tr>
<td>c. Stepped Rent (PH)</td>
<td>Not Currently Implemented</td>
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<tr>
<td>d. Stepped Rent (HCV)</td>
<td>Not Currently Implemented</td>
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<tr>
<td>e. Minimum Rent (PH)</td>
<td>Not Currently Implemented</td>
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<tr>
<td>f. Minimum Rent (HCV)</td>
<td>Not Currently Implemented</td>
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<tr>
<td>g. Total Tenant Payment as a Percentage of Gross Income (PH)</td>
<td>Not Currently Implemented</td>
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<tr>
<td>h. Total Tenant Payment as a Percentage of Gross Income (HCV)</td>
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<tr>
<td>i. Alternative Utility Allowance (PH)</td>
<td>Not Currently Implemented</td>
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<tr>
<td>j. Alternative Utility Allowance (HCV)</td>
<td>Not Currently Implemented</td>
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<tr>
<td>k. Fixed Rents (PH)</td>
<td>Not Currently Implemented</td>
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<tr>
<td>l. Fixed Subsidy (HCV)</td>
<td>Not Currently Implemented</td>
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<tr>
<td>m. Utility Reimbursements (PH)</td>
<td>Plan to Implement in the Submission Year</td>
</tr>
<tr>
<td>n. Utility Reimbursements (HCV)</td>
<td>Plan to Implement in the Submission Year</td>
</tr>
<tr>
<td>o. Initial Rent Burden (HCV)</td>
<td>Not Currently Implemented</td>
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<tr>
<td>p. Imputed Income (PH)</td>
<td>Not Currently Implemented</td>
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<tr>
<td>q. Imputed Income (HCV)</td>
<td>Not Currently Implemented</td>
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<tr>
<td>r. Elimination of Deduction(s) (PH)</td>
<td>Not Currently Implemented</td>
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<tr>
<td>s. Elimination of Deduction(s) (HCV)</td>
<td>Not Currently Implemented</td>
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<tr>
<td>t. Standard Deductions (PH)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>u. Standard Deductions (HCV)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>v. Alternative Income Inclusions/Exclusions (PH)</td>
<td>Plan to Implement in the Submission Year</td>
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<tr>
<td>w. Alternative Income Inclusions/Exclusions (HCV)</td>
<td>Plan to Implement in the Submission Year</td>
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<table>
<thead>
<tr>
<th>2. Payment Standards and Rent Reasonableness</th>
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</thead>
<tbody>
<tr>
<td>a. Payment Standards- Small Area Fair Market Rents (HCV)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>b. Payment Standards- Fair Market Rents (HCV)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>c. Rent Reasonableness – Process (HCV)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>d. Rent Reasonableness – Third-Party Requirement (HCV)</td>
<td>Not Currently Implemented</td>
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</tbody>
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<table>
<thead>
<tr>
<th>3. Reexaminations</th>
<th></th>
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</thead>
<tbody>
<tr>
<td>a. Alternative Reexamination Schedule for Households (PH)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>b. Alternative Reexamination Schedule for Households (HCV)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>c. Self-Certification of Assets (PH)</td>
<td>Plan to Implement in the Submission Year</td>
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<tr>
<td>d. Self-Certification of Assets (HCV)</td>
<td>Plan to Implement in the Submission Year</td>
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<table>
<thead>
<tr>
<th>4. Landlord Leasing Incentives</th>
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</thead>
<tbody>
<tr>
<td>a. Vacancy Loss (HCV-Tenant-based Assistance)</td>
<td>Plan to Implement in the Submission Year</td>
</tr>
<tr>
<td>b. Damage Claims (HCV-Tenant-based Assistance)</td>
<td>Plan to Implement in the Submission Year</td>
</tr>
<tr>
<td>c. Other Landlord Incentives (HCV- Tenant-based Assistance)</td>
<td>Plan to Implement in the Submission Year</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>5. Housing Quality Standards (HQS)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Pre-Qualifying Unit Inspections (HCV)</td>
<td>Plan to Implement in the Submission Year</td>
</tr>
<tr>
<td>b. Reasonable Penalty Payments for Landlords (HCV)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>c. Third-Party Requirement (HCV)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>d. Alternative Inspection Schedule (HCV)</td>
<td>Not Currently Implemented</td>
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<tr>
<th>6. Short-Term Assistance</th>
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<tbody>
<tr>
<td>a. Short-Term Assistance (PH)</td>
<td>Not Currently Implemented</td>
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<tr>
<td>b. Short-Term Assistance (HCV)</td>
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<thead>
<tr>
<th>7. Term-Limited Assistance</th>
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</thead>
<tbody>
<tr>
<td>a. Term-Limited Assistance (PH)</td>
<td>Not Currently Implemented</td>
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<tr>
<td>b. Term-Limited Assistance (HCV)</td>
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<thead>
<tr>
<th>8. Increase Elderly Age (PH &amp; HCV)</th>
<th></th>
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</table>
## 9. Project-Based Voucher Program Flexibilities

<table>
<thead>
<tr>
<th>Description</th>
<th>Status</th>
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</thead>
<tbody>
<tr>
<td>a. Increase PBV Program Cap (HCV)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>b. Increase PBV Project Cap (HCV)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>d. Alternative PBV Selection Process (HCV)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>f. Increase PBV HAP Contract Length (HCV)</td>
<td>Not Currently Implemented</td>
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<tr>
<td>g. Increase PBV Rent to Owner (HCV)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>h. Limit Portability for PBV Units (HCV)</td>
<td>Not Currently Implemented</td>
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</table>

## 10. Family Self-Sufficiency Program with MTW Flexibility

<table>
<thead>
<tr>
<th>Description</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. PH Waive Operating a Required FSS Program (PH)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>a. HCV Waive Operating a Required FSS Program (HCV)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>b. PH Alternative Structure for Establishing Program Coordinating Committee (PH)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>c. PH Alternative Family Selection Procedures (PH)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>c. HCV Alternative Family Selection Procedures (HCV)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>d. PH Modify or Eliminate the Contract of Participation (PH)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>d. HCV Modify or Eliminate the Contract of Participation (HCV)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>e. PH Policies for Addressing Increases in Family Income (PH)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>e. HCV Policies for Addressing Increases in Family Income (HCV)</td>
<td>Not Currently Implemented</td>
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</tbody>
</table>

## 11. MTW Self-Sufficiency Program

<table>
<thead>
<tr>
<th>Description</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. PH Alternative Family Selection Procedures (PH)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>a. HCV Alternative Family Selection Procedures (HCV)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>b. PH Policies for Addressing Increases in Family Income (PH)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>b. HCV Policies for Addressing Increases in Family Income (HCV)</td>
<td>Not Currently Implemented</td>
</tr>
</tbody>
</table>

## 12. Work Requirement

<table>
<thead>
<tr>
<th>Description</th>
<th>Status</th>
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</thead>
<tbody>
<tr>
<td>a. Work Requirement (PH)</td>
<td>Plan to Implement in the Submission Year</td>
</tr>
<tr>
<td>b. Work Requirement (HCV)</td>
<td>Plan to Implement in the Submission Year</td>
</tr>
</tbody>
</table>

## 13. Use of Public Housing as an Incentive for Economic Progress (PH)

<table>
<thead>
<tr>
<th>Description</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Use of Public Housing as an Incentive for Economic Progress (PH)</td>
<td>Not Currently Implemented</td>
</tr>
</tbody>
</table>

## 14. Moving on Policy

<table>
<thead>
<tr>
<th>Description</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Waive Initial HQS Inspection Requirement (HCV)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>b. PH Allow Income Calculations from Partner Agencies (PH)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>b. HCV Allow Income Calculations from Partner Agencies (HCV)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>c. PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>c. HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)</td>
<td>Not Currently Implemented</td>
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</tbody>
</table>

## 15. Acquisition without Prior HUD Approval (PH)

<table>
<thead>
<tr>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td>Acquisition without Prior HUD Approval (PH)</td>
<td>Plan to Implement in the Submission Year</td>
</tr>
</tbody>
</table>

## 16. Deconcentration of Poverty in Public Housing Policy (PH)

<table>
<thead>
<tr>
<th>Description</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Deconcentration of Poverty in Public Housing Policy (PH)</td>
<td>Not Currently Implemented</td>
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</table>

## 17. Local, Non-Traditional Activities

<table>
<thead>
<tr>
<th>Description</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Rental Subsidy Programs</td>
<td>Not Currently Implemented</td>
</tr>
<tr>
<td>b. Service Provision</td>
<td>Not Currently Implemented</td>
</tr>
</tbody>
</table>
C. MTW Activities Plan that Sheffield Plans to Implement in the Submission Year or Is Currently Implementing

<table>
<thead>
<tr>
<th>1.e. - Minimum Rent (PH)</th>
</tr>
</thead>
<tbody>
<tr>
<td>SHA has a $50 minimum rent presently, but when the utility payment is greater than the $50 minimum rent, the tenant receives a utility reimbursement. SHA plans to discontinue the utility reimbursement for new tenants coming onto the programs (with the exception of elderly/disabled tenants.) and will discontinue payment at the next annual reexamination for current tenants. Going forward, no tenant will pay less than $50 rent.</td>
</tr>
<tr>
<td>This MTW activity serves the following statutory objectives:</td>
</tr>
<tr>
<td>Cost effectiveness</td>
</tr>
<tr>
<td>Increased revenue</td>
</tr>
<tr>
<td>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</td>
</tr>
<tr>
<td>This MTW activity applies to:</td>
</tr>
<tr>
<td>New admissions and currently assisted households</td>
</tr>
<tr>
<td>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</td>
</tr>
<tr>
<td>This MTW activity requires a Hardship Policy. The Hardship Policy is attached.</td>
</tr>
<tr>
<td>Attached Hardship policy applies to:</td>
</tr>
<tr>
<td>1.e. - Minimum Rent (PH)</td>
</tr>
<tr>
<td>1.f. - Minimum Rent (HCV)</td>
</tr>
<tr>
<td>3.a. - Alternative Reexamination Schedule for Households (PH)</td>
</tr>
<tr>
<td>3.b. - Alternative Reexamination Schedule for Households (HCV)</td>
</tr>
<tr>
<td>12.a. - Work Requirement (PH)</td>
</tr>
<tr>
<td>12.b. - Work Requirement (HCV)</td>
</tr>
<tr>
<td>No hardship were requested in the most recent fiscal year.</td>
</tr>
<tr>
<td>In the prior year, under this activity, Sheffield MTW agency</td>
</tr>
<tr>
<td>Received 0 hardship requests</td>
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<tr>
<td>Approved hardship requests</td>
</tr>
<tr>
<td>Denied hardship requests</td>
</tr>
<tr>
<td>There is/are hardship requests pending.</td>
</tr>
<tr>
<td>This MTW activity requires an Impact Analysis. The Impact Analysis is attached.</td>
</tr>
<tr>
<td>minimum rent or minimum Total Tenant Payment (TTP) - $50</td>
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<table>
<thead>
<tr>
<th>1.f. - Minimum Rent (HCV)</th>
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<tbody>
<tr>
<td>SHA has a $50 minimum rent presently, but when the utility payment is greater than the $50 minimum rent, the tenant receives a utility reimbursement. With MTW, SHA is discontinuing the utility reimbursements and every tenant will pay at least the $50 minimum rent.</td>
</tr>
<tr>
<td>This MTW activity serves the following statutory objectives:</td>
</tr>
<tr>
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<tr>
<td>Increased revenue</td>
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<tr>
<td>Decreased expenditures</td>
</tr>
<tr>
<td>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</td>
</tr>
<tr>
<td>This MTW activity applies to:</td>
</tr>
<tr>
<td>New admissions and currently assisted households</td>
</tr>
<tr>
<td>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</td>
</tr>
<tr>
<td>The MTW activity applies to all tenant-based units</td>
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<tr>
<td>N/A</td>
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</tbody>
</table>
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, Sheffield MTW agency
Received 0 hardship requests
Approved hardship requests
Denied hardship requests
There is/are hardship requests pending.

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

Minimum rent or minimum Total Tenant Payment (TTP) - $50

<table>
<thead>
<tr>
<th>1.i. - Alternative Utility Allowance (PH)</th>
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<tbody>
<tr>
<td>SHA has a problem with over-housing in public housing. This many times is a result of household members moving out over the years leaving the head of household alone in a large apartment. Trying to enforce our policy to move them to the proper sized unit to accommodate a family who needs the larger unit, has caused problems in the community. SHA would like to change the application of our utility schedule to be the same as that for the HCV program so that staff uses the lower of the unit size leased or that of the unit the family is eligible for under our occupancy standards. This does not mean that incoming tenants could choose to lease a larger unit and pay the difference, but it would mean that current and future tenants who are over-housed would be asked at their next re-examination to either move to an appropriately sized unit or pay rent based upon the unit size they actually qualify for.</td>
</tr>
</tbody>
</table>

This MTW activity serves the following statutory objectives:
Cost effectiveness

This MTW activity serves the following statutory objectives:
Increased revenue

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

No hardship were requested in the most recent fiscal year.

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

(d) Use of utility allowance schedule. The PHA must use the appropriate utility allowance for the lesser of the size of dwelling unit actually leased by the family or the family unit size as determined under the PHA subsidy standards. In cases where the unit size leased exceeds the family unit size as determined under the PHA subsidy standards as a result of a reasonable accommodation, the PHA must use the appropriate utility allowance for the size of the dwelling unit actually leased by the family.

This is allowed in the HCV program under 24 CFR 982.517 (d) (above) SHA would like to apply it to our PH program to ensure that residents who are over-housed and do not agree to move to the correct sized unit do not pay less rent for a larger unit than they would for the correct size unit. This does not mean that new tenants could choose to rent a unit larger than that for which they are eligible under SHA’s occupancy standards.

<table>
<thead>
<tr>
<th>1.j. - Alternative Utility Allowance (HCV)</th>
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<tbody>
<tr>
<td>N/A</td>
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Approved hardship requests
Denied hardship requests
There is/are hardship requests pending.

N/A

<table>
<thead>
<tr>
<th>1.m. - Utility Reimbursements (PH)</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
</tr>
</tbody>
</table>

No hardship were requested in the most recent fiscal year.
SHA will eliminate utility reimbursements for both PH & HCV when the utility allowance is greater than the total tenant payment. This calculation will be applied first to new tenants and then to existing tenants at their reexamination one full year after implementation. This policy will not be applied to elderly/disabled households. SHA spends an average of $15,000 per month on utility reimbursements. These savings will be directed to the Help-Your-Self (H.U.R.S.) program to pay salaries and to establish accounts to help with emergency expenses, such as transportation, childcare, utility payments, etc. Since the policy will be implemented slowly and will not apply to elderly/disabled households, full savings will not be apparent for some time.

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

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

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

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Sheffield MTW agency
- Received 0 hardship requests
- Approved hardship requests
- Denied hardship requests
- There are no hardship requests pending.

1.n. - Utility Reimbursements (HCV)

SHA will eliminate utility reimbursements for both PH & HCV when the utility allowance is greater than the total tenant payment. This calculation will be applied first to new tenants and then to existing tenants at their reexamination one full year after implementation. This policy will not be applied to elderly/disabled households. SHA spends an average of $15,000 per month on utility reimbursements. These savings will be directed to the Help-Your-Self (H.U.R.S.) program to pay salaries and to establish accounts to help with emergency expenses, such as transportation, childcare, utility payments, etc. Since the policy will be implemented slowly and will not apply to elderly/disabled households, full savings will not be apparent for some time.

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

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

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

No hardship were requested in the most recent fiscal year.

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

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

- $2,000 up-front medical deduction for working families. (Medical expenses in excess of this amount will be deducted at
full value (no 3% of income). This is to help with insurance premiums, or with out-of-pocket medical expenses.
* 10% earned income deduction for working families. This is to help with expenses associated with work, such as transportation expenses, uniforms, etc.
• Out-of-pocket dependent care deductions SHA will not pay more than the rate established by the AL Dept. of Human Resources for comparable care in a licensed child-care facility.
These exclusions are meant to incentivize working families. This will be applied to all new tenants and to existing tenants at their next reexamination or at an interim if the tenant requests after being notified of the implementation of the policy.

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

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

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

No hardship were requested in the most recent fiscal year.

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

Following inclusions or exclusions will be eliminated, modified, or added.
• $2,000 up-front medical deduction for working families. (Medical expenses in excess of this amount will be deducted at full value (no 3% of income). This is to help with insurance premiums, or with out-of-pocket medical expenses.
• 10% earned income deduction for working families. This is to help with expenses associated with work, such as transportation expenses, uniforms, etc.
• Out-of-pocket dependent care deductions equal to those paid by the State of Alabama..

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

Alternate Income Inclusions/Exclusions for MTW households in both PH & HCV will include:
• $2,000 up-front medical deduction for working families. (Medical expenses in excess of this amount will be deducted at full value (no 3% of income). This is to help with insurance premiums, or with out-of-pocket medical expenses.
10% earned income deduction for working families. This is to help with expenses associated with work, such as transportation expenses, uniforms, etc.
• Out-of-pocket dependent care deductions SHA will not pay more than the rate established by the AL Dept. of Human Resources for comparable care in a licensed child-care facility.
These deductions are meant to incentivize working families by helping them see a positive economical outcome to working. This will be applied to all new tenants and to existing tenants at their next reexamination or at an interim if the tenant requests after being notified of the implementation of the policy.

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

This MTW activity serves the following statutory objectives:
Decreased revenue

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

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

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

The MTW activity applies only to all tenant-based units

No hardship were requested in the most recent fiscal year.
Following inclusions or exclusions will be eliminated, modified, or added.

- $2,000 up-front medical deduction for working families. (Medical expenses in excess of this amount will be deducted at full value (no 3% of income). This is to help with insurance premiums, or with out-of-pocket medical expenses.
- 10% earned income deduction for working families. This is to help with expenses associated with work, such as transportation expenses, uniforms, etc.
- Out-of-pocket dependent care deductions comparable to State guidelines to allow work or school attendance. If the State pays $45 a day for example, SHA will not pay more.

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

SHA will implement biennial reexaminations for elderly/disabled tenants with fixed-income. All other tenants will have annual reexaminations and will only have to report increases in income at the annual reexamination, instead of within 10 days. This should save time for staff since very few actually report within 10 days, resulting in re-payment agreements, which take staff time to arrange and monitor. One interim reexamination will be allowed per year if the household gross income has decreased 10% or if there is an increase or decrease in family composition. If the decrease is such that the family will not be meeting the work requirement, the family will be referred to the H.U.R.S. program to help the family meet the work requirement within 90 days. Failure to do so will result in the lease or contract not being renewed at the next reexamination. ROSS & FSS tenants may choose to report income increases any time, knowing that doing so will increase their rent payment as well as their escrow. An appeal process and hardship policy has been developed.

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

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

Attached Hardship policy applies to: 1.e. - Minimum Rent (PH)
1.f. - Minimum Rent (HCV)
3.a. - Alternative Reexamination Schedule for Households (PH)
3.b. - Alternative Reexamination Schedule for Households (HCV)
12.a. - Work Requirement (PH)
12.b. - Work Requirement (HCV)

No hardship were requested in the most recent fiscal year.

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

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

Recertification Schedule is Once every two years

Household may request 1 interim recertifications per year.

SHA’s other tenants/participants will have annual reexaminations and will only have to report increases in income at the annual reexamination, instead of within 10 days as is current policy. This should save time for staff since very few actually report within 10 days, resulting in re-payment agreements, which take staff time to arrange and monitor. One interim reexamination will be allowed per year if the household gross income has decreased 10% or if there is an increase or decrease in family composition. If the decrease is such that the family will not be meeting the work requirement, the family will be referred to the H.U.R.S. program to help the family meet the work requirement within 90 days. Failure to do so will result in the lease or contract not being renewed at the next reexamination. FSS tenants may choose to report income increases any time, knowing that doing so will increase their rent payment as well as their FSS escrow.

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

3.a., 3.b.) Alternative Reexamination Schedule for PH & HCV
SHA will implement biennial reexaminations for elderly/disabled tenants with fixed-income. All other tenants will have annual reexaminations and will only have to report increases in income at the annual reexamination, instead of within 10 days. This should save time for staff since very few actually report within 10 days, resulting in re-payment agreements,
which take staff time to arrange and monitor. One interim reexamination will be allowed per year if the household gross income has decreased 10% or if there is an increase or decrease in family composition. If the decrease is such that the family will not be meeting the work requirement, the family will be referred to the H.U.R.S. program to help the family meet the work requirement within 90 days. Failure to do so will result in the lease or contract not being renewed at the next reexamination. ROSS & FSS tenants may choose to report income increases any time, knowing that doing so will increase their rent payment as well as their escrow. An appeal process and hardship policy has been developed.

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

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

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

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

The MTW activity applies to all tenant-based units

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

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Sheffield 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
- Biennial for elderly\disabled, annually for all others.

Household may request 1 interim recertifications per year.

SHA’s other tenants/participants will have annual reexaminations and will only have to report increases in income at the annual reexamination, instead of within 10 days as is current policy. This should save time for staff since very few actually report within 10 days, resulting in re-payment agreements, which take staff time to arrange and monitor. One interim reexamination will be allowed per year if the household gross income has decreased 10% or if there is an increase or decrease in family composition. If the decrease is such that the family will not be meeting the work requirement, the family will be referred to the H.U.R.S. program to help the family meet the work requirement within 90 days. Failure to do so will result in the lease or contract not being renewed at the next reexamination. FSS tenants may choose to report income increases any time, knowing that doing so will increase their rent payment as well as their FSS escrow.

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

At reexamination, SHA will allow self-certification of assets up to $50,000 for both PH & HCV. This will save staff time

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

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

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

No hardship were requested in the most recent fiscal year.

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

The dollar threshold for the self-certification of assets is $50,000.
3.d. - Self-Certification of Assets (HCV)

At reexamination, SHA will allow self-certification of assets up to $50,000 for HCV. This will save staff time.

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

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

No hardship were requested in the most recent fiscal year.

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

The dollar threshold for the self-certification of assets is $50,000.

4.a. - Vacancy Loss (HCV-Tenant-based Assistance)

a. If a tenant breaks a lease, abandons the unit, or SHA terminates the assistance mid-lease term, the landlord will be entitled to a payment equal to one month's contract rent, when the unit is leased to another voucher holder.

This MTW activity serves the following statutory objectives:
Housing choice
Increased expenditures

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

No hardship were requested in the most recent fiscal year.

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

This policy applies to To all units

The types of units policy applies to:

Maximum payment to the landlord is $No more than one month of the contract rent and it is only payable when the unit is rented to another voucher holder..

payments were issued under this policy y in the most recently completed PHA fiscal year.
$ issued under this policy in the most recently completed PHA fiscal year.

4.b. - Damage Claims (HCV-Tenant-based Assistance)

If a tenant leaves a unit damaged, the amount of damage claims must not exceed the lesser of the cost of repairs or two months of contract rent, minus the security deposit. The video of the initial and/or most recent inspection will be used to verify damages at move-out. This will be paid when the unit is leased to another voucher holder.

This MTW activity serves the following statutory objectives:
Housing choice
Increased expenditures

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

No hardship were requested in the most recent fiscal year.

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

This policy applies to To all units

The types of units policy applies to:

Maximum payment to the landlord is $The amount of damage claims must not exceed the lesser of the cost of repairs or two months of contract rent, minus the security deposit.
payments were issued under this policy y in the most recently completed PHA fiscal year.

$0 issued under this policy in the most recently completed PHA fiscal year.

4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)
SHA will provide a landlord incentive for each new unit that a landlord leases to a HCV tenant equal to the contract rent or $500, whichever is less.

This MTW activity serves the following statutory objectives:
Housing choice

This MTW activity serves the following statutory objectives:
Increased expenditures

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

No hardship were requested in the most recent fiscal year.

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

This policy applies to To all units (Display selected and additional Pop up is complex logic.)

The types of units policy applies to:

Maximum payment to the landlord is $$500 or one month's contract rent, whichever is less.

0 payments were issued under this policy y in the most recently completed PHA fiscal year.

$0 issued under this policy in the most recently completed PHA fiscal year.

5.a. - Pre-Qualifying Unit Inspections (HCV)
SHA will allow pre-qualifying unit inspections; if the inspections have been conducted within 90 days of the participant occupying the unit; if a written copy of the inspection can be provided; if the inspection standards at 24 CFR 982.401 have been met ;and if the tenant agrees that the inspection accurately represents the condition of the unit. Even if the tenant agrees to the use of a pre-existing inspection, the tenant may request an interim inspection at any time.

This MTW activity serves the following statutory objectives:
Housing choice

This MTW activity serves the following statutory objectives:
Decreased expenditures

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

No hardship were requested in the most recent fiscal year.

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

The pre-inspection is valid for 90 days.
**5.d. - Alternative Inspection Schedule (HCV)**

No hardship were requested in the most recent fiscal year.

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

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

Sheffield Housing Authority’s motto has always been, “If we can’t help you, we’ll help you find someone who can.” We have created many partnerships, both formal and informal, with the service providers in our area. With our MTW designation, we will be able to formalize our services and have some resources of our own through fungibility to make our program successful. Our social service program will be called, “Help Your Self” (H.U.R.S) and will be comprised of the following components:

a. HCV & PH FSS worker – This worker will be responsible for the HCV & PH FSS Programs and the Homeownership Program for HCV. These programs are already in place and have been successful. We receive an FSS grant each year for 1 FSS coordinator.

b. A ROSS Service Coordinator for Public Housing: We have applied for funding for this position, but even if not received, we will still implement this program.

c. An elderly/disabled service coordinator. This service is already in place but will be expanded under MTW.

d. A Homeless Coordinator. – North West Alabama Housing Services (MWAHS) our affiliate non-profit provides this service for SHA. They operate a Homeless Day Center, 3 units of emergency housing, and counseling services to help those who need to meet eligibility requirements for assisted housing.

e. A Child & Family Services Coordinator – This is a partnership with the Sheffield Public Schools. This licensed therapist works with public housing families whose children attend the public schools and with families in crisis. Her salary is split between the two entities.

The cost-effective measures and time saving measures discussed in other waivers plus our funding fungibility ability, will make it possible to provide these services to all tenants, applicants, and some low-income community members, i.e. the homeless. Participating in service programs will not be mandatory, but will be offered to everyone.

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

No hardship were requested in the most recent fiscal year.

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

MTW Self-Sufficiency policy is not mandatory for anyone.

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

Sheffield Housing Authority’s motto has always been, “If we can’t help you, we’ll help you find someone who can.” We have created many partnerships, both formal and informal, with the service providers in our area. With our MTW designation, we will be able to formalize our services and have some resources of our own through fungibility to make our program successful. Our social service program will be called, “Help Your Self” (H.U.R.S) and will be comprised of the following components:

a. HCV & PH FSS worker – This worker will be responsible for the HCV & PH FSS Programs and the Homeownership Program for HCV. These programs are already in place and have been successful. We receive an FSS grant each year for 1 FSS coordinator.

b. A ROSS Service Coordinator for Public Housing: We have applied for funding for this position, but even if not received, we will still implement this program.

c. An elderly/disabled service coordinator. This service is already in place but will be expanded under MTW.

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

No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Sheffield MTW agency
Received 0 hardship requests
Approved hardship requests
Denied hardship requests
There is/are hardship requests pending.

<table>
<thead>
<tr>
<th>12.a. - Work Requirement (PH)</th>
</tr>
</thead>
<tbody>
<tr>
<td>12. Work Requirement for PH</td>
</tr>
<tr>
<td>The Work Requirement mandates that all non-elderly/disabled, able-bodied adults age 18 and older work a minimum of 15 hours a week. The maximum work requirement can be met if the adults in the family work a combination of 30 hours a week. The Work Requirement may be met by participation 15 hours a week in HURS, which provides training or educational program, or by community service. Participation in social services (HURS) is not required, but for new applicants who do not participate, they still must meet the Work Requirement within 6 months, or be given a termination of assistance notice, and their lease will not be renewed at annual reexamination. For current tenants who do not meet the work requirement, they will be given 6 months before implementation to comply or their lease will not be renewed. This policy does not apply to the elderly/disabled households or to a primary caretaker for a child under 6 years of age or pregnant, or who are exempt from the Community Service Requirement. but they will be given the chance to participate if they wish.</td>
</tr>
<tr>
<td>This MTW activity serves the following statutory objectives:</td>
</tr>
<tr>
<td>Cost effectiveness</td>
</tr>
<tr>
<td>Self-sufficiency</td>
</tr>
</tbody>
</table>

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

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

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

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

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

| Attached Hardship policy applies to: 12.a. - Work Requirement (PH) |
| 12.b. - Work Requirement (HCV) |

| No hardship were requested in the most recent fiscal year. |

| In the prior year, under this activity, Sheffield 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 counts as work under this activity: The Work Requirement mandates that all non-elderly/disabled, able-bodied adults age 18 and older work a minimum of 15 hours a week. The maximum work requirement can be met if the adults in the family work a combination of 30 hours a week. The Work Requirement may be met by participation 15 hours a week in HURS, which provides training or educational program, or community service. Participation in social services (HURS) is not required, but for new applicants who do not participate, they still must meet the Work Requirement within 6 months, or be given a termination of assistance notice, and their lease will not be renewed at annual reexamination. For current tenants who do not meet the work requirement, they will be given 6 months after implementation to comply or their lease will not be renewed at their next reexamination. |
| The following is how will the MTW agency monitor compliance: SHA has acquired social service software to monitor compliance with the work requirement. Our software also has capability to help with monitoring. |
| The following supportive services are offered to support households: For new hires, SHA will be able to assist with uniforms, transportation issues, and childcare costs for a period of time. The income exclusions discussed in other waivers will apply as well. SHA has an FSS Coordinator, a ROSS Coordinator, a Child and Family Services Counselor we share with the school, an Elderly/disabled Coordinator, a Homeownership Coor. and a Homeless Coordinator to provide a full array of services depending upon the need |
The following is how the agency address noncompliance with the work requirement policy: Participation in social services (HURS) is not required, but for new work-able applicants who do not participate, they still must meet the Work Requirement within 6 months, or be given a termination of assistance notice, and their lease will not be renewed at annual reexamination. For current work-able tenants who do not meet the work requirement, they will be given 6 months after implementation to comply or their lease will not be renewed. This policy does not apply to the elderly/disabled households or to a primary caretaker of a child under 6 years of age or to a pregnant person or to a person exempt from Community Service.

0 households are currently subject to the policy.

households were sanctioned for non-compliance with the work requirement in the most recently completed PHA fiscal year.

12.b. - Work Requirement (HCV)

The Work Requirement mandates that all non-elderly/disabled, able-bodied adults age 18 and older work a minimum of 15 hours a week. The maximum work requirement work requirement can be met if the adults in the family work a combination of 30 hours a week. The Work Requirement may be met by participation 15 hours a week in HURS, or by participation in a training or educational program, or community service. For new applicants who do not participate in these programs, they still must meet the work requirement within 6 months, or be given a termination of assistance notice, and their lease will not be renewed. For current tenants who do not meet the work requirement, they will be given 6 months before implementation to comply or their lease will not be renewed. This policy does not apply to the elderly/disabled and caretakers for children under 6, pregnant, or those exempt from community service, but they will be given the chance to participate in the H.U.R.S. program, if they wish.

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

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

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

The MTW activity applies to all tenant-based units

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

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Sheffield 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 counts as work under this activity: The Work Requirement may be met by participation 15 hours a week in HURS, or by participation in a training or educational program, or by community service.

The following is how will the MTW agency monitor compliance: SHA has social service software to monitor compliance and our housing software (MRI Lindsey) also has this capability.

The following supportive services are offered to support households: New hires may be offered any required clothing, transportation assistance, or childcare assistance to make their working possible. SHA has partnerships with several work sites who will accept referrals from SHA and we refer to the Career Center and other job placement agencies. Income exclusions will also apply. SHA has an FSS Coor., a ROSS Coor., a Child and Family Services Counselor, , an Elderly/Disabled Coor., a Homeownership Coor., and a Homeless Coor. to provide afull array of services.

The following is how the agency address noncompliance with the work requirement policy: Any applicants who are work-able will be offered services to help them meet the Work Requirement, which they may refuse, but our new policies will explain to them that their file will be reviewed at 6 months and if they are not meeting the Work Requirement at that
time, they will be given another 6 months to comply or their lease will not be renewed. They will be apprised of the Hardship Policy & Grievance Policy during initial leasing, with the 6 month notice, and with the lease non-renewal notice. For current tenants who do not meet the work requirement, they will be notified that they have 6 months to comply after implementation. All services will be offered, or their lease will be terminated at the end of another 6 month period. The HCV Manager will be responsible for tracking their compliance.

0 households are currently subject to the policy.

households were sanctioned for non-compliance with the work requirement in the most recently completed PHA fiscal year.

15. - Acquisition without Prior HUD Approval (PH)

SHA demolished 16 PH units a few years ago and has only replaced 10 of the 16 units. SHA would like to acquire the remaining 6 units. Acquiring without prior HUD approval will make it possible for SHA to be competitive in a tight real estate market. SHA understand that the relevant materials must be provided to HUD within 30 days: 1. proof of approval by local zoning 2. An independent appraisal 3. An environmental assessment.

This MTW activity serves the following statutory objectives:

- Housing choice
- Increased revenue
- Increased expenditures

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

No hardship were requested in the most recent fiscal year.

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

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

17.b. - Service Provision

SHA is very interested in being able to use our funding for activities that may benefit low-income people in our community. The demolition/acquisition project described above is one such activity since some of the vacant land will be donated to our partner, Habitat for Humanity, whose participants may not be our tenants/participants. We will use funds to buy household furnishings for the homeless who have been lucky enough to find a home, or maybe to fix a roof for an elderly person so she can age-in-place. Applicants often need emergency assistance while waiting on housing, such as food, or transportation costs.

This MTW activity serves the following statutory objectives:

- Self-sufficiency
- Housing choice
- Increased expenditures

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

No hardship were requested in the most recent fiscal year.

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

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

The following are the types of Services MTW Agency is providing: a. HCV & PH FSS worker – This worker will be responsible for the HCV & PH FSS Programs and the Homeownership Program for HCV. These programs are already in place and have been successful. We receive an FSS grant each year for 1 FSS coordinator.
b. A ROSS Service Coordinator for Public Housing - We have applied for funding for this position, and received it in June 2021.
c. An elderly/disabled service coordinator. This service is already in place but will be expanded under MTW.
d. A Homeless Coordinator. – North West Alabama Housing Services (MWAHS) our affiliate non-profit provides this
service for SHA. They operate a Homeless Day Center, 3 units of emergency housing, and counseling services to help the homeless meet eligibility requirements for assisted housing.

e. A Child & Family Services Coordinator – This is a partnership with the Sheffield Public Schools. This licensed therapist works with public housing families whose children attend the public schools and with families in crisis. Her salary is split between the two entities.

PHA provides services to 110 households in the most recently completed PHA Fiscal Year through this activity.

The MTW activity applies to all units/properties

10 # of persons receiving LNT services only in the most recently completed PHA fiscal year.

10 # of persons receiving LNT services only in the most recently completed PHA fiscal year.

**17.c. - Housing Development Programs**

SHA will provide gap financing to our affiliate non-profit, Northwest Alabama Housing Services (NWAHS) to buy, build, and/or renovate units to be used by the non-profit as transitional housing for homeless families. NWAHS currently operates a day center for the homeless and has 2 units for emergency housing, but nothing for supportive/transitional housing for the homeless who are not ready for permanent housing. NWAHS will own and manage any such units and will provide the supportive services necessary to assist the tenants to become eligible and ready for permanent housing, such as that provided through SHA’s Mainstream program. The use of SHA’s MTW funding and NWAHS’ funding together will allow NWAHS to purchase properties immediately, as they become available, in a very tight market. Because NWAHS is an affiliate of SHA, we believe competitive bidding for these funds should not be required, but SHA will do so if necessary. SHA will not use more than 10% of HAP funding for this activity.

SHA will also MTW funding for administrative costs to implement a recent grant received from Congress to demolish, or buy & renovate derelict property in the City of Sheffield. The renovated properties will be used as rental property or sold to any low-income (below 80% of AMI) family in Colbert Co., AL. No HAP funds will be used for this activity.

This MTW activity serves the following statutory objectives:

- Housing choice

This MTW activity serves the following statutory objectives:

- Increased expenditures

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

No hardship were requested in the most recent fiscal year.

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

Received 0 hardship requests

Approved hardship requests

 Denied hardship requests

There is/are hardship requests pending.

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

<table>
<thead>
<tr>
<th>Name of Development and Address</th>
<th>MTW Role: Acquisition, Rehabilitation, New Construction?</th>
<th>Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other</th>
<th>Number of Affordable Units</th>
<th>Total Number of Units</th>
<th>Number of Units by Affordability - 80% of AMI</th>
<th>Number of Units by Affordability - 60% of AMI</th>
<th>Number of Units by Affordability - 30% of AMI</th>
<th>Number of Units by Affordability - Other</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
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<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

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

**Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year**

<table>
<thead>
<tr>
<th>Name of Development and Address</th>
<th>MTW Role: Acquisition, Rehabilitation, New Construction?</th>
<th>Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other</th>
<th>Number of Affordable Units</th>
<th>Total Number of Units</th>
<th>Number of Units by Affordability - 80% of AMI</th>
<th>Number of Units by Affordability - 60% of AMI</th>
<th>Number of Units by Affordability - 30% of AMI</th>
<th>Number of Units by Affordability - Other</th>
</tr>
</thead>
</table>

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

<table>
<thead>
<tr>
<th>Name of Development and Address</th>
<th>MTW Role: Acquisition, Rehabilitation, New Construction?</th>
<th>Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other</th>
<th>Number of Affordable Units</th>
<th>Total Number of Units</th>
<th>Number of Units by Affordability - 80% of AMI</th>
<th>Number of Units by Affordability - 60% of AMI</th>
<th>Number of Units by Affordability - 30% of AMI</th>
<th>Number of Units by Affordability - Other</th>
</tr>
</thead>
</table>
D. Safe Harbor Waivers.

<table>
<thead>
<tr>
<th>D.1</th>
<th>Safe Harbor Waivers seeking HUD Approval:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>No Safe Harbor Waivers are being requested.</td>
</tr>
</tbody>
</table>

E. Agency-Specific Waiver(s).

<table>
<thead>
<tr>
<th>E.1</th>
<th>Agency-Specific Waiver(s) for HU D Approval:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>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.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>E.2</th>
<th>Agency-Specific Waiver(s) for which HUD Approval has been Received:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>MTW Agency does not have approved Agency-Specific Waivers</td>
</tr>
</tbody>
</table>

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>$1,738,744</td>
<td>$1,026,068</td>
<td>$712,676</td>
<td>2021-12-31</td>
</tr>
</tbody>
</table>
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.

<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></td>
</tr>
<tr>
<td>49%-30% Area Median Income</td>
<td></td>
</tr>
<tr>
<td>Below 30% Area Median Income</td>
<td></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.**

**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:

<table>
<thead>
<tr>
<th>PROPERTY NAME/ADDRESS</th>
<th>0/1 BR</th>
<th>2 BR</th>
<th>3 BR</th>
<th>4 BR</th>
<th>5 BR</th>
<th>6+ BR</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></td>
<td></td>
<td></td>
<td></td>
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</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.

<p>| Occupied Number of Local, Non-Traditional units by |</p>
<table>
<thead>
<tr>
<th>Family Size:</th>
<th>Household Size</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Person</td>
<td></td>
</tr>
<tr>
<td>2 Person</td>
<td></td>
</tr>
<tr>
<td>3 Person</td>
<td></td>
</tr>
<tr>
<td>4 Person</td>
<td></td>
</tr>
<tr>
<td>5 Person</td>
<td></td>
</tr>
<tr>
<td>6+ Person</td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td>0</td>
</tr>
</tbody>
</table>

**H. Public Comment**

Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.

**I. Evaluations.**

No known evaluations.
MTW Hardship Policy

Anytime an applicant or resident/participant perceives that any MTW policy causes the family any adverse effects, i.e. financial, social, etc, the family may request a Hardship Exemption. (This process will be the same as that described in SHA’s Informal Review and Grievance Policy, which is attached to this document.) SHA will review its hardship policy with applicants/tenants during intake and recertification processes. SHA must also consider if a resident qualifies for a hardship exemption at the time of a potential termination of assistance that is due to an MTW activity. When a resident requests a hardship exemption from a required MTW activity, the agency must suspend the activity for the household, beginning the next month after the request, until the MTW agency has determined if the request is warranted. The agency shall make the determination of whether a financial or other hardship exists within a reasonable time after the family’s request. If the agency determines that a financial or other hardship exists, the MTW agency must continue to provide an exemption from the MTW activity at a reasonable level and duration, according to the agency’s written policy. If an agency determines that the request did not meet its hardship standards, they must resume the MTW activity and collect any retroactive rent, if applicable, through a reasonable repayment agreement.

SHA’s policy for determining what constitutes hardship will include the following situations:

- The family has experienced a decrease in income because of changed circumstances, including loss or reduction of employment, death in the family, or reduction in or loss of earnings or other assistance;
- The family has experienced an increase in expenses, because of changed circumstances, for medical costs, childcare, transportation, education, or similar items; and
- Such other situations and factors determined by the agency to be appropriate.

SHA shall keep records of all hardship requests received and the results of these requests and supply them at HUD’s request. This information must be retained by the agency for the duration of the agency’s participation in the MTW demonstration program and available for public review and inspection at the agency’s principal office during normal business hours.
XXXIX. Applicant Informal Review

A. Applicant Informal Review:
The HA must give an applicant for participation prompt notice of a decision denying assistance to the applicant. The notice must contain a brief statement of the reasons for the HA decision. The notice must also state that the applicant may request an informal review of the decision and must describe how to obtain the informal review. The request must be in writing and presented to the HA within ten days of the notice of denial.

1. Informal Review Process:
The HA must give an applicant an opportunity for an informal review of the HA decision denying assistance to the applicant. The review may be conducted by any person or persons designated by the HA, other than a person who made or approved the decision under review or a subordinate of this person. The applicant must be given an opportunity to present written or oral objections to the HA decision. The HA must notify the applicant of the final decision after the informal review. This notice must include a brief statement of the reasons for the final decision.

2. Informal Review Not Required:
An informal review is not required to be given by the HA in the following circumstances:
   a. Discretionary administrative determinations by the HA.
   b. General policy issues or class grievances.
   c. A determination of the family unit size under the HA subsidy standards.
   d. An HA determination not to approve the suspension or extension of a voucher term.
   e. A determination not to grant approval to lease a unit under the program, or to approve a proposed lease.
   f. A determination that a unit selected by the applicant is not in compliance with HQS.
   g. A determination that the unit is not in accordance with HQS because of the family size or composition

B. Participant Informal Hearing

C. Participant Informal Hearing:
The HA must give an opportunity to the participant for an informal hearing to consider whether the HA decisions relating to the individual circumstances of a participant family are in accordance with the law, HUD regulations, and HA policies. Under the following circumstances:

1. A determination of the family’s annual or adjusted income, and the use of such income to compute the housing assistance payment.
2. A determination of the appropriate utility allowance for tenant-paid utilities from the HA utility allowance schedule.
3. A determination of the family unit size under the HA subsidy standards.
4. A determination that the family is receiving subsidy for a larger number of bedrooms than appropriate for the family unit size under the HA subsidy
standards, or the HA determination to deny the family's request for an exception from the standards.

5. A determination to terminate assistance for a participant family because of the family's action or failure to act.

6. A determination to terminate assistance because the participant family has been absent from the assisted unit for more than fourteen days in a calendar year.

In the cases described hereinabove, the HA must give the opportunity for an informal hearing before the HA terminates housing assistance payments for the family under an outstanding HAP contract.

1. The HA is not required to give an informal hearing for any of the following:
   a. Discretionary administrative determinations by the HA.
   b. General policy issues or class grievances.
   c. Establishment of the HA schedule of utility allowances for families in the program.
   d. A HA determination not to approve an extension or suspension of a voucher term.
   e. A HA determination not to approve a unit or lease.
   f. A HA determination that an assisted unit is not in compliance with HQS. Provided, however, that the HA must provide the opportunity for an informal hearing for a decision to terminate assistance for a breach of the HQS caused by the family as described in the Voucher/Lease Addendum, or in other HUD rules and regulations or HA policies.
   g. A HA determination that a unit is not in accordance with HQS because of the family size.
   h. A HA determination to exercise or not to exercise any right or remedy against the owner under a HAP contract.

2. Notice to the Family:
The HA must notify the family that the family may ask for an explanation of the basis of the HA determination, and if the family does not agree with the determination, the family may request an informal hearing on the decision. The housing authority must give the family prompt written notice that the family may request a hearing, and this notice must contain a brief statement of the reasons for the decision, state that if the family does not agree with the decision, the family may request an informal hearing on the decision. The family has ten days from the date of the notice to request in writing an informal hearing. The hearing will be scheduled by the HA within ten days from the date of the request.

D. Hearing Procedures:
The HA must give the participant an opportunity for an informal hearing of the HA decision terminating assistance to the participant. The hearing may be conducted by any person or persons designated by the HA, other than a person who made or approved the decision under review or a subordinate of this person. The person who conducts the hearing may regulate the conduct of the hearing in accordance with the HA hearing procedures. The HA and the participant shall each have the right to review any and all relevant documents which may be used in the hearing. If these documents are not made available for review, they may not be used in the hearing. Any fees for copying or procuring the documents shall be
at the expense of the requesting party. The participant may be represented by a lawyer or other representative at the hearing. Costs of representation shall be the responsibility of the participant. The participant must be given an opportunity to present written or oral objections to the HA decision. The HA and the family must be given the opportunity to present evidence, and may question any witnesses. Evidence may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings. The HA must notify the applicant of the final decision after the informal review. This notice must include a brief statement of the reasons for the final decision. Factual determination relating to the individual circumstances of the family shall be based upon a preponderance of the evidence presented at the hearing. A copy of the hearing decision shall be furnished promptly to the family.
Grievance Policy
Sheffield Housing Authority

This policy governs the handling of a “grievance” (An actual or supposed circumstance regarded as just cause for complaint.) that a tenant may have with the Housing Authority due to an adverse action taken against the tenant by the Housing Authority.

APTF
07/2016
I. RIGHT TO A HEARING

Upon the filing of a written request as provided in these procedures, a Tenant shall be entitled to a hearing before a hearing officer.

II. DEFINITIONS

For the purpose of this Grievance Procedure, the following definitions are applicable:

(A) "Grievance" shall mean any dispute which a Tenant may have with respect to Landlord action or failure to act in accordance with the individual Tenant's lease or Landlord regulations which adversely affect the individual Tenant's rights, duties, welfare, or status. Grievance does not include any dispute a Tenant may have with Landlord concerning a termination of tenancy or eviction that involves any activity that may threaten the health, safety, or right to peaceful enjoyment of the Landlord's public housing premises by other Tenants or employees of the Landlord, or any criminal activity or drug-related criminal activity on or off such premises.

(B) "Complainant" shall mean any Tenant whose grievance is presented to the Landlord or at the project management office in accordance with Section III and Section IV.

(C) "Elements of due process" shall mean an eviction action or a termination of tenancy in a State or local court in which the following procedural safeguards are required:

1. Adequate notice to the Tenant of the grounds for terminating the tenancy and for eviction;
2. Right of the Tenant to be represented by counsel;
3. Opportunity for the Tenant to refute the evidence presented by the Landlord including the right to confront and cross-examine witnesses and to present any affirmative legal or equitable defense which the Tenant may have;
4. A decision on the merits.

(D) "Hearing officer" shall mean a person selected in accordance with Section IV of these procedures to hear grievances and render a decision with respect thereto.

(E) Tenant shall mean the adult person (or persons) (other than a live-in aide):

1. Who resides in the premises, and who executed the lease with the Landlord as lessee of the premises, or, if no such person now resides in the premises,
2. Who resides in the premises, and who is the remaining head of household of the Tenant family residing in the premises.

(F) Resident organisation includes a resident management corporation.

(G) Promptly (as used in Section III, and IV) (D) Shall mean within five business days from the date of mailing of the adverse action or grievable complaint.

III. PROCEDURES PRIOR TO A HEARING

Informal settlement of grievances: Any grievance shall be promptly and personally presented, either orally or in writing, to the Landlord office or to the office of the project in which the Tenant resides so that the grievance may be discussed informally and settled without a hearing. A summary of such discussion shall be prepared within a reasonable time and one copy shall be given to the Tenant and one retained in the Landlord's Tenant file. The summary shall specify the names of the participants, dates of meeting, the nature of the proposed disposition of the complaint and the specific reasons therefor, and shall specify the procedures by which a hearing under these procedures may be obtained if the Tenant is not satisfied. The purpose of this informal settlement of grievances is to allow the Tenant and management to informally discuss an issue without the need for third parties, including witnesses or representatives, to be involved. At any time that a third party, including a witness or representative becomes or should become involved in the process, the informal settlement conference may, in the sole discretion of the housing authority, become a "hearing" and the procedures found in Section IV hereof shall apply. The housing authority shall notify the Tenant of the date, time and location that the hearing will take place.

APF
July 2016
IV. PROCEDURES TO OBTAIN A HEARING

(A) Request for hearing: In the event that the Tenant is not satisfied with the informal settlement of grievance provided for in Section III, the Tenant shall submit a written request for a hearing to the Landlord or the project office within five (5) business days from date of mailing of the summary of discussion pursuant to Section III. The written request shall specify:

(1) The reasons for the grievance; and
(2) The action or relief sought.

(B) Selection of Hearing Officer: A grievance hearing shall be conducted by an impartial person appointed by the Landlord other than a person who made or approved the Landlord action under review or a subordinate of such person.

The Landlord shall annually submit a list of prospective hearing officers. This list shall be provided to any existing resident organization for such organization's comments or recommendations. The Landlord shall consider any comments or recommendations by the resident organization submitted in a reasonable time.

From this list, a hearing officer shall be selected.

(C) Failure to request a hearing: If the Tenant does not request a hearing in accordance with this Section, then the Landlord's disposition of the grievance under Section III shall become final: Provided, That failure to request a hearing shall not constitute a waiver by the Tenant of the right thereafter to contest the Landlord's action in disposing of the complaint in an appropriate judicial proceeding.

(D) Hearing prerequisite: All grievances shall be promptly presented in person, either orally or in writing pursuant to the informal procedure prescribed in Section III as a condition precedent to a hearing under this section: Provided, That if the Tenant shall show good cause why there was failure to proceed in accordance with Section III the hearing officer, the provisions of this Subsection may be waived by the hearing officer.

(E) Escrow deposit: Before a hearing is scheduled in any grievance involving the amount of rent as defined in the lease which the Landlord claims is due, the Tenant shall pay to the Landlord an amount equal to the amount of the rent due and payable as of the first of the month preceding the month in which the act or failure to act took place. The Tenant shall thereafter deposit monthly the same amount of the monthly rent in an escrow account held by the Landlord until the complaint is resolved by decision of the hearing officer. Amounts deposited into the escrow shall not be considered as acceptance of money for rent during the period in which the grievance is pending. These requirements may be waived by the Landlord in extenuating circumstances. Unless so waived, the failure to make such payments shall result in a termination of the grievance procedure: Provided, That failure to make payment shall not constitute a waiver of any right the Tenant may have to contest the Landlord's disposition of his grievance in any appropriate judicial proceeding. Provided, however, that if a public housing family requests a hearing under this policy, to review the HA's determination denying or limiting the family's claim to a financial hardship exemption the family is not required to pay any escrow deposit in order to obtain a grievance hearing on such issues.

(F) Scheduling of hearings: Upon the Tenant's compliance with this Section, or upon the housing authority notifying the tenant or his/her representative that a hearing will be held, a hearing shall be promptly scheduled by the hearing officer for a time and place reasonably convenient to both the Tenant and the Landlord. A written notification specifying the date, time, place, and the procedures governing the hearing shall be delivered to the Tenant and the appropriate Landlord official.

V. PROCEDURES GOVERNING THE HEARING

(A) The Tenant shall be afforded a fair hearing, which shall include:

(1) The opportunity to examine before the grievance hearing any Landlord documents, including records and regulations that are directly relevant to the hearing. The Tenant shall be provided a copy of any such document at the Tenant's expense. If the Landlord does not make the document available for examination upon request by the Tenant, the Landlord may not rely on such document at the grievance hearing.

(2) The right to be represented by counsel or other person chosen as the Tenant's representative and to have such person make statements on the Tenant's behalf;

(3) The right to a private hearing unless the Tenant requests a public hearing;

(4) The right to present evidence and arguments in support of the Tenant's complaint, to controvert evidence relied on by the Landlord or project management, and to confront and cross-examine all witnesses upon whose testimony or information the Landlord or project management relies; and

(5) A decision based solely and exclusively upon the facts presented at the hearing.

(B) Accommodation of persons with disabilities:

(1) The Landlord shall provide reasonable accommodation for persons with disabilities to participate in the hearing.

Reasonable accommodation may include qualified sign language interpreters, readers, accessible locations, or attendants.

(2) If the Tenant is visually impaired, any notice to the Tenant which is required by these procedures must be in an accessible format.

(C) At the hearing, the complaint must first make a showing of an entitlement to the relief sought and thereafter the HA must sustain the burden of justifying the HA action or failure to act against which the complaint is directed.

APTF
July 2016
VI. DECISION OF THE HEARING OFFICER

(A) The hearing officer shall prepare a written decision, together with the reasons therefor, within a reasonable time (not to exceed 10 calendar days) after the hearing. A copy of the decision shall be sent to the Tenant and the Landlord. The Landlord shall retain a copy of the decision in the Tenant's folder. A copy of such decision, with all names and identifying references deleted, shall also be maintained on file by the Landlord and made available for inspection by a prospective complainant, his representative, or the hearing officer.

(B) The decision of the hearing officer shall be binding on the Landlord which shall take all actions, or refrain from any actions, necessary to carry out the decision unless the Landlord's Board of Commissioners determines within a reasonable time, and promptly notifies the complainant of its determination, that:

1. The grievance does not concern Landlord action or failure to act in accordance with or involving the Tenant's lease or Landlord regulations, which adversely affect the Tenant's rights, duties, welfare or status;

2. The decision of the hearing officer is contrary to applicable Federal, State or local law, Landlord regulations or requirements of the Annual Contributions Contract between Landlord and the U.S. Department of Housing and Urban Development.

(C) A decision by the hearing officer or Board of Commissioners in favor of the Landlord or which denies the relief requested by the Tenant in whole or in part shall not constitute a waiver of, or affect in any manner whatsoever, any rights the Tenant may have to a trial de novo or judicial review in any judicial proceedings, which may thereafter be brought in the matter.

I have received a copy of this grievance procedure and have had an opportunity to ask questions about the procedure.
12. Work Requirement – Impact Analysis

Currently SHA has around 100 tenants, non-elderly/non-disabled, in both our PHA and HCV programs who have little to no wage income. They will be our baseline to determine effectiveness of this program. After implementation these current tenants will be notified at their next reexamination that they must meet the Work Requirement within 6 months or their lease will not be renewed at the next year’s reexamination. They will also be referred to H.U.R.S. for assistance in finding a job, participating in a training/educational program, or any other activity that will fulfill the work requirement.

After implementation, new able-bodied tenants will be notified of the conditions of the Work Requirement and will be referred to H.U.R.S. for assistance in meeting the requirement. Or, failing to meet the requirements at 6 months, they will be given notice that their lease will not be renewed at their reexamination.

There is a concern that some tenants will not wish to participate in becoming more self-sufficient, as participation in the H.U.R.S. program is not mandatory, so the end-of-participation rate of the housing authority could be affected at the beginning of implementation, but we believe that will level off after the first full year of MTW. We also believe the tenant-paid portion of the rent will increase during the first year of the program and grow steadily thereafter. However, services provided under the H.U.R.S. program, such things as uniforms for work, help with transportation costs, childcare costs, etc., will affect the budget negatively. We won’t know until after a 1 year cycle the actual affect.

The waitlist may grow once the community learns about all the social services, we are now able to provide to help individuals with jobs and/or training, or conversely, some prospective applicants may decline to apply.

We have current tenants who we believe would be granted a hardship request due to special circumstances. We except to receive many hardship requests and have put into place a hardship policy under which we grant or deny each one, based upon their individual circumstances.

Lastly SHA believes within a few years we will begin to see a small decrease of tenure in residency for tenants, as their income increases and they become more self-sufficient. We expect to see an increase in participation in our Homeownership Program as well.
During the two resident meetings we shared a PowerPoint with the waivers being considered at the time and explained to those in attendance who would be affected and the main goals of being a MTW agency. Afterwards residents were asked if they had any questions or comments, below is the compilation.

Questions/Answers for two Resident Meetings for MTW:

Need more low-income property, too many so-called “low income” apartments are too expensive for elderly. What are you doing to fix this? We are trying to build or buy properties that are affordable for all, especially elderly/disabled.

What changes will MTW have to me? As an elderly classification you will have biennial re-exams.

For others? Work requirements, no utility reimbursement, income reported only at re-exam, etc.

Will Stimulus checks effect our rent? No.

Where is the property located that SHA plans to purchase? Currently in the City of Sheffield, but always looking around the County for options.

Thankful to have been put on Section 8! We are glad you are happy with the program.

Does those with Mainstream Vouchers have income? Yes, everyone with a voucher must have some source of income.

What does it take to get on the Home Ownership Program? There are specific income and employment requirements.

What is the Incentive for Landlords to rent units? Currently $500 per new unit leased.

As a person on Section 8 can I move my voucher within the county? Yes you can.

As a person on Section 8 is my apartment supposed to be inspected? Yes, currently once a year.

General Comments:

This sounds amazing!

The work requirement is how it should be.

More property for low-income people.
<table>
<thead>
<tr>
<th>Name</th>
<th>Phone Number</th>
</tr>
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<tbody>
<tr>
<td>Valerie Davis</td>
<td>256-383-5007</td>
</tr>
<tr>
<td>David Chamble</td>
<td>- 320-5760</td>
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<tr>
<td>Doris White</td>
<td>256-629-4444</td>
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<tr>
<td>Cornelia Isaac</td>
<td>256-263-8827</td>
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<tr>
<td>Linda S. Smith</td>
<td>256-80-6465</td>
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<tr>
<td>Willie Bell Beckett</td>
<td>256-381-9625</td>
</tr>
<tr>
<td>Travis</td>
<td>256-980-9014</td>
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<tr>
<td>Morris Brothers</td>
<td>256-394-4111</td>
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<tr>
<td>Alcapone Smith</td>
<td>250-710-3841</td>
</tr>
<tr>
<td>Maudie Hugh</td>
<td>256-740-7021</td>
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<tr>
<td>Michael Richardson</td>
<td>248-1918</td>
</tr>
<tr>
<td>Susan Green</td>
<td>256-248-1945</td>
</tr>
<tr>
<td>Arutha Fisher</td>
<td>256-248-1972</td>
</tr>
<tr>
<td>Laura Melton</td>
<td>(256) 383-1069</td>
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<tr>
<td>Name</td>
<td>Phone Number</td>
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<tr>
<td>Izzy Pemberton</td>
<td>252-256-2557</td>
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<tr>
<td>Linda Adkins</td>
<td>252-874-4633</td>
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<tr>
<td>Traci Siler</td>
<td>252-366-4823</td>
</tr>
<tr>
<td>Melissa Storey</td>
<td>252-740-7021</td>
</tr>
<tr>
<td>Linnea Echols</td>
<td>252-344-3689</td>
</tr>
</tbody>
</table>
At the public meeting scheduled November 10, 2020, we were unable to have attendance other than staff. The COVID numbers in Colbert County are second highest in the state and many of our community partners were unwilling to attend an in-person meeting. However, Executive Director, Shirley Whitten reached out to our primary partners to detail our plans for MTW and how they will be able to work with us. Those who we reached out to were as follows:

- The Mayor of Sheffield
- The Assistant Superintendent of Sheffield City Schools
- The District Judge for Colbert County
- Community Action
- Helen Keller Hospital
ATTENTION LANDLORDS

Moving to Work is changing the way Sheffield Housing Authority (SHA) is able to work with landlords. SHA will hold a public meeting on May 6th at 5:30 pm for all Section 8 Landlords and those who are interested in becoming a Section 8 Landlord. SHA will address new incentives and policies for the upcoming year such as; a $500 new unit incentive, damage reimbursement for damages incurred by any Section 8 tenants, new Fair Housing Laws and a new lease option. The meeting will be held at the Logan Room, 307 N. Montgomery Ave., Sheffield, AL 35660. There will be hors d’oeuvres available to all who attend. Please RSVP to hcvspecialist@sheffieldhousing.com.
"Moving to Work" is Here!

"Moving to Work" (MTW) Program gives the Sheffield Housing Authority the ability to change certain procedures so that they can offer additional resources for their tenants. Staff members will be able to assist more with family Self-Sufficiency and Resident Services. Our Staff will guide tenants to achieve educational goals, obtain good jobs, and increase their earned income. More emphasis will be given to assisting our elderly and disabled tenants. The Moving to Work Program is a "Win-Win" situation for all of our residents!

To learn more about the new changes coming your way, please join us at one of our Resident Hearings we have scheduled:

"Moving to Work" Resident Hearings
(Educational meetings updating our tenants about new changes coming their way)

Tuesday, May 18, 2021
1st Meeting: 10:00 a.m.
OR
2nd Meeting: 5:00 p.m.

The Meetings will be held at the SHA Main Office in our Training Room
At 505 N. Columbia Avenue, Downtown Sheffield

***************

***See the Insert In this Newsletter to learn more details about all of the great changes coming your way with MTW!

(Also: Mark your calendar for a SHA Public Hearing to be held Tuesday, June 15, 2021 at 6:00 p.m. at the Main Office at 505 N. Columbia Avenue, Downtown Sheffield. This meeting will address the "Moving to Work" Program and Supplement Changes to our Annual Plan)
PUBLIC HEARING

The Sheffield Housing Authority has prepared significant amendments to the 2021 Annual Plan and has completed the Moving to Work (MTW) Supplement to the Annual Plan.

A Public Hearing to discuss the amendments to the 2021 Annual Plan and the MTW Supplement will be held June 15, 2021 at 10:00 a.m. at the offices of Sheffield Housing Authority located at 505 N. Columbia Ave., Sheffield, AL 35660.

The documents may be viewed at the above address upon request.
Mrs. Selena Ricks, a representative of the Department of Labor, attended today’s Public Hearing with vested interest in determining how Sheffield Housing Authority could be a resource for her particular client population. Mrs. Ricks works daily with the veteran population of five North Alabama Counties.

One current participant in our Section 8 program also attended. Mrs. Linda Smith asked questions about and was given contact information for the Family Self Sufficiency Coordinator.

At the close of meeting, both participants agreed that the plans Sheffield Housing Authority have in place, as a Moving to Work Agency, are practical and manageable to get able-bodied people on their way to being self-sufficient and providing the quality of life for the elderly and disabled population.
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 (4/01/2021_______), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

(3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).


(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 those 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 59 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.

Sheffield Housing Authority

**MTW PHA NAME**

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).

Shirley Whitten

**NAME OF AUTHORIZED OFFICIAL**

Secretary, Board of Commissioners

**TITLE**

**SIGNATURE**

7/20/2021

**DATE**

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