

PHA Name : Solano County

PHA Code : CA131

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2022

PHA Program Type: Housing Choice Voucher (HCV) only

MTW Cohort Number: 1

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The Solano County Housing Authority (SCHA) exists to serve our community's housing needs using all resources available. Participation in the Department of Housing and Urban Development's (HUD) Moving-to-Work (MTW) demonstration provides the SCHA with the ability to make the best use of existing program funds to assist the City of Dixon, City of Rio Vista, and the unincorporated areas of Solano County's very low- and low-income residents to obtain safe, decent, and affordable housing. Participation in the MTW demonstration supports the SCHA's goal to provide affordable housing opportunities through creative partnerships with public and private collaborators. Participation in the MTW demonstration also expands the SCHA's ability to provide participants with opportunities to achieve self-sufficiency. The SCHA is able to utilize the benefits of the Moving-to-Work (MTW) to meet the three statutory objectives of the MTW Demonstration Program in the following ways:

Cost-Effectiveness -

Reexaminations: SCHA is transitioning to requiring reexaminations every 36 months for families in which at least 90 percent of income is from a fixed source. The reexamination process can be cumbersome for persons who are elderly and/or disabled families that may have sight, hearing, cognitive, and/or mobility, etc. issues, or other families in which at least 90% of their income is from a fixed source. This burden can be removed as these families have few, if any, changes in household income and/or composition from year to year. Changing required reexaminations for these families from every 12 months to every 36 months will also reduce the administrative burden for the SCHA.

Self-Certification of Assets: The SCHA has increased the value of family assets and anticipated asset income, when applicable. The SCHA will accept the family's self-certification from \$5,000 or less to \$50,000 or less. All assets valued over \$50,000 will continue to require 3rd party verification.

Self-Sufficiency -

Funding flexibility and streamlining administrative processes allow the SCHA to expand resources and staff assistance provided to program participants during the housing search process. Activities may include expanded briefing topics/activities such as warm referrals to rental and/or utility deposit assistance, developing a rental profile, practicing completing rental applications, and/or reviewing credit/rental history.

Housing Choice -

Tenant Rent Policies: The SCHA increased the 40 percent affordability cap to 50 percent at initial lease-up in order to increase housing choice for low-income households. This has increased low-income families' ability to secure housing in low-poverty concentration and areas of opportunity.

Landlord Leasing Incentives: By combining the activities available under the Landlord Leasing Incentives category, the SCHA has launched its Landlord Partnership Program (LPP). The LPP is aimed at expanding rental opportunities for families holding housing choice vouchers by making landlord participation in the program more attractive. The LPP provides financial incentives to landlords who rent to housing choice voucher participants in the form of vacancy payments, damage claims funds, and additional lease-up incentives to landlords with new units.

Housing Quality Standards: In conjunction with the LPP, the SCHA conducts pre-qualifying unit inspections for landlords that are willing to participate in the program but have not yet identified an eligible tenant. Conducting pre-qualifying inspections supports the recruitment of new landlords and units as well as retaining existing units within the portfolio of available housing.

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

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

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

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

1.o. - Initial Rent Burden (HCV)
In May 2022, the Solano County Housing Authority (SCHA) increased the 40 percent affordability cap to 50 percent at initial lease-up in order to increase housing choice for low-income households. SCHA anticipates that this will increase low-income families' ability to secure housing in low-poverty concentration and areas of opportunity.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity serves the following statutory objectives: Neutral (no cost implications)
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
During the fiscal year, the SCHA worked on amending its Administrative Plan to incorporate the policies needed to implement this activity. As the activity was implemented within the final quarter of the program year, the SCHA does not yet have the data on how the changes have impacted program participants.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Solano County MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
Maximum income-based rent percentage 50.00%

3.b. - Alternative Reexamination Schedule for Households (HCV)
In May 2022, the SCHA transitioned to conducting reexaminations at least every 36 months for families in which at least 90 percent of income is from a fixed source. The reexamination process can be cumbersome for persons who are elderly and/or disabled families

that may have sight, hearing, cognitive, and/or mobility, etc. issues, or other families in which at least 90% of their income is from a fixed source. This burden can be removed as these families have few, if any, changes in household income and/or composition from year to year. Changing required reexaminations for these families from every 12 months to every 36 months will also reduce the administrative burden for the SCHA.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
During the fiscal year, the SCHA worked on amending its Administrative Plan to incorporate the policies needed to implement this activity. The SCHA also worked with its client management software provider to ensure that necessary updates needed to the software to track these changes could be incorporated. As the activity was implemented within the final quarter of the program year, the SCHA does not yet have the data on how the changes have impacted program participants.
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, Solano County MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
Recertification Schedule is Once every three years
Household may request 2 or more interim recertifications per year.
Households will be able to submit interim recertification requests to the Housing Authority between annual reexaminations.

3.d. - Self-Certification of Assets (HCV)
In May 2022, the Solano County Housing Authority (SCHA) increased the value of family assets and anticipated asset income, when applicable. The SCHA accepts the family's self-certification of income from assets of \$50,000 or less. All assets valued over \$50,000 will continue to require third-party verification.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
During the fiscal year, the SCHA worked on amending its Administrative Plan to incorporate the policies needed to implement this activity. The SCHA also worked with its client management software provider to ensure that necessary updates needed to the software to track these changes could be incorporated. As the activity was implemented within the final quarter of the program year, the SCHA does not yet have the data on how the changes have impacted program participants.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Solano County 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)
In May 2022, the Solano County Housing Authority (SCHA) launched its Landlord Participation Program (LPP). This includes vacancy loss payments to incentivize a landlord's continued participation in the HCV program. The SCHA will

make additional payments to the landlord for SCHA related lease-up delays to encourage landlord continued participation.
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
During the fiscal year, the SCHA worked on amending its Administrative Plan to incorporate the policies needed to implement this activity. The SCHA consulted with HUD and other MTW agencies to develop its Landlord Participation Program. The SCHA also worked with its client management software provider to ensure that necessary updates needed to the software to track these changes could be incorporated. As the activity was implemented within the final quarter of the program year, the SCHA does not yet have the data on how the changes have impacted program participants.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Solano County 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 \$Payments to the Landlord would not exceed the equivalent of one month's contract rent..
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.

4.b. - Damage Claims (HCV-Tenant-based Assistance)
In May 2022, the Solano County Housing Authority (SCHA) launched its Landlord Participation Program to incentive a landlord's continued participation in the HCV program. If a current tenant leaves damages to a unit beyond normal wear and tear, the SCHA may process a damage claim to the landlord.
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
During the fiscal year, the SCHA worked on amending its Administrative Plan to incorporate the policies needed to implement this activity. The SCHA consulted with HUD and other MTW agencies to develop its Landlord Participation Program. The SCHA also worked with its client management software provider to ensure that necessary updates needed to the software to track these changes could be incorporated. As the activity was implemented within the final quarter of the program year, the SCHA does not yet have the data on how the changes have impacted program participants.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Solano County 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.
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.

4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)
In May 2022, the Solano County Housing Authority (SCHA) launched its Landlord Participation Program to incentivize new landlords to join the HCV program. The SCHA will provide lease-up incentive payments to landlords that place units that have not been assisted in the previous 12 months on the program.
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
During the fiscal year, the SCHA worked on amending its Administrative Plan to incorporate the policies needed to implement this activity. The SCHA consulted with HUD and other local MTW agencies on current best practices for landlord incentive programs. The SCHA also worked with its client management software provider to ensure that necessary updates needed to the software to track these changes could be incorporated. As the activity was implemented within the final quarter of the program year, the SCHA does not yet have the data on how the changes have impacted program participants.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Solano County 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 \$Payments to the landlord must be equal to no more than one month of the contract rent..
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)
In May 2022, the Solano County Housing Authority (SCHA) began to offer pre-qualifying unit inspections (also known as a pre-inspection) on vacant units that are ready for occupancy, by request.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity serves the following statutory objectives: Neutral (no cost implications)
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
During the fiscal year, the SCHA worked on amending its Administrative Plan to incorporate the policies needed to implement this activity. The SCHA also worked with its client management software provider to ensure that necessary updates needed to the software to track these changes could be incorporated. As the activity was implemented within the final quarter of the program year, the SCHA does not yet have the data on how the changes have impacted program participants.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Solano County 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.

9.e. - Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)
In April 2022, the SCHA implemented its Project-Based Voucher (PBV) program which included allowing shared housing

as a housing type eligible under the PBV program. Allowing shared housing as an eligible PBV housing type will increase housing options for homeless Veterans in the SCHA jurisdiction.
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
During the fiscal year, the SCHA worked on amending its Administrative Plan to incorporate the policies needed to implement this activity. The SCHA also worked with its client management software provider to ensure that necessary updates needed to the software to track these changes could be incorporated. As the activity was implemented within the final quarter of the program year, the SCHA does not yet have the data on how the changes have impacted program participants.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Solano County MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
The MTW agency anticipates 0 number of shared housing units in the fiscal year.
The MTW agency assisted 6 number of shared housing units in the most recently completed PHA fiscal year.
The MTW agency anticipates 0 number of manufactured housing units in the fiscal year.
The MTW agency assisted 0 number of manufactured housing units in the most recently completed PHA fiscal year.

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

E.	Agency-Specific Waiver(s).
E.1	Agency-Specific Waiver(s) for HUD Approval: The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, Agency-Specific Waivers may be requested. No Agency-Specific Waivers are being requested.
E.2	Agency-Specific Waiver(s) for which HUD Approval has been Received: MTW Agency does not have approved Agency-Specific Waivers

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
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G.	MTW Statutory Requirements.
G.1	<p>75% Very Low Income – Local, Non-Traditional.</p> <p>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.</p>
Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income	
49%-30% Area Median Income	
Below 30% Area Median Income	
Total Local, Non-Traditional Households	0

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

G.2	Establishing Reasonable Rent Policy.

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

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

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

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.	
Occupied Number of Local, Non-Traditional units by	

Family Size:	Household Size
1 Person	
2 Person	
3 Person	
4 Person	
5 Person	
6+ Person	
Totals	0

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

I.	Evaluations.
No known evaluations.	

Solano County Housing Authority
Move-To-Work Designation
Virtual* Community Outreach Meeting
Scheduled September 14, 2020

*Note: Due to COVID-19 Public Health restrictions, this meeting was held virtually by zoom.

Fiscal Year 2021/2022 proposed activities were presented.

Presenter(s): Tamara Colden – Housing Services Administrator
Kimberly Aguilar – Housing Specialist

of Participants: 3

Comments Received: 2

Comment 1 - Participant 1 questioned whether or not she would be required to work because she is disabled.

Response 1 – Tamara Colden explained that at this time, the HA is not proposing any activities that would require participants to work. Also reminded participant that this is a public meeting and to contact the HA with any questions on concerns specific to her case.

Comment 2 - Participant 1 commented that she is happy that HA is looking to implement the discussed activities.

Response 2 – Comment accepted.

No written comments received – see attached transcript

Solano County Housing Authority
Move-To-Work Designation
Virtual* Community Outreach Meeting
Scheduled September 17, 2020

*Note: Due to COVID-19 Public Health restrictions, this meeting was held virtually by zoom.

Fiscal Year 2021/2022 proposed activities were presented.

Presenter(s): Tamara Colden – Housing Services Administrator
Kimberly Aguilar – Housing Specialist

of Participants: 2

Comments Received: 0

No written comments received – see attached transcript

Solano County Housing Authority
Annual and MTW Supplemental Plan
Virtual RAB/Community Outreach Meeting
Scheduled March 24, 2022

Draft Annual Plan and Draft MTW Supplemental Plan for Fiscal Year 2022/2023 were presented and discussed.

Presenter(s): Tamara Colden – Housing Services Administrator
 Kimberly Aguilar – Housing Specialist

of Participants: 2

Comments Received:

Comment 1 – Is the goal to help FSS participant families become more self-sufficient?

Response 1 – The FSS coordinators work with each individual participant family regarding the goals of that family to reach self-sufficiency. Overall, the FSS program is designed to support families in exploring educational opportunities as this leads to self-sufficiency.

Comment 2 – I support expansion of the FSS program. It is a great program.

Response 2 – N/A

Comment 3 – What is the 40% rule?

Response 3 – Families finding new units to rent are limited to paying a maximum of 40% of their adjusted monthly income towards their share of rent and utilities. SCHA has implemented the MTW waiver to increase that to 50% to increase housing options for participants.

Comment 4 – Is there an asset limit for the program?

Response 4 – No, there is no asset limit for this program at this time.

Comment 5 – How do the Project Based Vouchers differ from the Housing Choice vouchers?

Response 5 – Project based vouchers are tied to a pre-contracted unit. As long as the family remains in the unit, they will receive assistance. If the family moves from the unit, they will no longer receive assistance. Housing Choice Vouchers are tied to the

family. The family will receive assistance in the unit of their choice as long as the unit meets eligibility requirements.

To date - No written comments received

Solano County Housing Authority
Annual and MTW Supplemental Plan
Public Hearing
Scheduled April 12, 2022

Draft Annual Plan and Draft MTW Supplemental Plan for Fiscal Year 2022/2023 were presented and discussed.

Presenter(s): Tamara Colden – Housing Services Administrator

Board Comments Received:

Comment 1 – How do we get more vouchers?

Response 1 – HUD has determined the number of vouchers allocated to the SCHA. HUD also releases NOFAs as the opportunity for additional vouchers arises. During these times, SCHA may apply for more vouchers. In example, the SCHA received additional VASH vouchers it applied for in 2021.

Comment 2 – How many vouchers do we need?

Response 2 – I do not have those numbers at this time but can provide that information at a latter date.

Comment 3 – I think we should place N/A in the areas of the MTW Plan that do not apply to our program.

Response 3 – N/A

Solano County Housing Authority (SCHA) Hardship Policy

All hardship requests must be made in writing, stating both the reason for the hardship and the expected duration.

Each request will be reviewed and weighed against other local resources available to the family. The result of the review may consist in referral to other local resources, an adjustment in the portion of the family's rent, or a modification of the family's repayment agreement.

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

- The household is in compliance with all the program rules and regulations.
- The household has lost Federal, State or local government assistance.
- The household has applied for a Federal, State or local government assistance program and is waiting for eligibility determination (including legal immigrants).
- The household's income decreased due to a change in circumstances, including, but not limited to, the loss of employment.
- There has been a death in the household resulting in loss of income to the household.
- Some other specified circumstances.

Approval Process for all Rent Reform Initiatives

Households who meet the criteria listed above may complete and return the SCHA Hardship Exemption Form by mail, fax, or e-mail their request to SCHA.

Housing Technician will review the request promptly and forward the result and the tenant file to the Housing Specialist.

Housing Specialist approves the request if there are no other issues. If there are other issues, the supervisor will conduct further review and consult with Housing Services Administrator.

Hardship Relief

Households who qualify and receive hardship exemption approval will be reevaluated at the end of their approved exemption period, at the next annual recertification, biennial recertification, or relocation, whichever comes first.

Decisions reached by SCHA will be final.

HARDSHIP POLICY/EXEMPTION FORM

Participant Name: _____ Date: _____ Voucher #: _____

Section 1: *To be completed by program participant*

I am requesting a hardship exemption on the following:

- ☐ Repayment Agreement

I can provide evidence satisfactory to the Housing Authority (HA) that the threshold applicable to my family's debt would impose an undue hardship.

- ❖ The HA may in its sole discretion determine that a lower monthly payment amount or temporary deferment is reasonable. The HA will consider both short-term (90 days) and long-term (case-by-case) exemptions.

- ☐ MTW Policy

I can provide evidence satisfactory to the Housing Authority (HA) that the MTW activity would impose an undue hardship. I am requesting the HA suspend the MTW activity for my household, beginning the next month after this request, until the HA has determined if the request is warranted.

- ❖ The HA will make a determination of whether a financial or other hardship exists within a reasonable time after the request is received. If the HA determines that the request did not meet its hardship standards, the MTW activity will be resumed.

In making its determination, the HA will consider all relevant information, including the following:

- Has the family 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;
- Has the family experienced an increase in expenses, because of changed circumstances, for medical costs, childcare, transportation, education, or similar items;
- Has the family experienced other situations and factors determined by the HA to be appropriate;

- ☐ Other _____

Section 2: Repayment Agreement – *To be completed by participant*

Explain how a modification to your repayment would benefit you and your household:

Section 3: Move To Work – To be completed by participant

Explain how a modification to the MTW activity would benefit you and your household:

Section 4: To be completed by Housing Technician/HA

I. Qualifying Hardship Exemptions:

- _____ The household has *lost* Federal, State or local government assistance.
- _____ The household has *applied* for a Federal, State or local government assistance program and is waiting for eligibility determination (including legal immigrants).
- _____ The household's income decreased due to a change in circumstances, including, but not limited to, the loss of employment.
- _____ There has been a death in the household resulting in loss of income to the household.
- _____ Other circumstances (please specify) _____

The family's current family share, as calculated under 24 CFR 982.515:

Current TTP _____ - U/A _____ - T/R _____ = \$ _____ (Use \$0 if total is < \$0)

II. Determination of Hardship Exemption Request:

Based on the information received, the Household has been approved for an exemption/modification to the _____ MTW Activity / Repayment Agreement.

- ☐ **Short-term** exception: (90 days)
- ☐ **Long-term** exception: Date MTW Activity/Repayments to resume: _____
- ☐ **Other**

Reason:

☐ Does **NOT qualify** for an exemption.

Reason:

Tamara Colden, Housing Services Administrator

Date

Alternative Reexamination Schedule for Families Impact Analysis

The SCHA must complete a written analysis of the various impacts of changing the Alternative Reexamination Schedule for Families.

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

Of all SCHA participant families, approximately 195 (76%) receive at least 90% of their income from a fixed source. Approximately 150 (77%) of those households are elderly and/or disabled.

Changing required reexaminations for these families from every 12 months to every 36 months will reduce the administrative burden for SCHA. Each annual takes the SCHA approximately 1.75 hours of staff time. And, taking into account the average amount of HAP SCHA will continue to pay annually due to implementing the new annual reexamination schedule, the SCHA will save approximately \$6,795.00 annually in administrative costs and \$4,850.00 in Housing Assistance Payments (HAP).

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

Affected families will not see a change in their rent portion due to SCHA required recertification annually.

This means that COLA increases received by the family will only be applied every third year.

SCHA will apply any payment standard increase during owner requested contract rent increases.

3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist);

This activity will not have an impact on the SCHA's waitlist.

4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency);

This activity will not have an impact on the SCHA's termination rate.

5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program;

SCHA does not operate Public Housing.

This activity will not have an impact on SCHA's utilization rate.

6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice;

This activity is anticipated to increase cost effectiveness of the program. This activity will decrease SCHA administrative time spent processing annual reexaminations.

7. Impact on the agency's ability to meet the MTW statutory requirements;

This activity will support the SCHA's ability to meet the MTW the following statutory requirements:

1. Substantially the Same Requirement
2. Comparable Mix Requirement

8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity; and

This activity will not have an impact on the rate of hardship requests nor the number granted or denied as a family can request an interim reexamination at any time.

9. Across the other factors above, the impact on protected classes (and any associated disparate impact).

No impact on protected classes.

ATTACHMENT 2
Moving to Work Certifications of Compliance

CERTIFICATIONS OF COMPLIANCE

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING

Certifications of Compliance with HUD and Federal Requirements and Regulations:
Board Resolution to Accompany Application to the Moving to Work Demonstration Program

Acting on behalf of the Board of Commissioners of the applicant public housing agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the application to the Moving to Work Demonstration Program for the PHA and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the application and implementation thereof:

- (1) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure at least 75% of families assisted are very low-income as defined in Section 3(b)(2) of the 1937 Act throughout the PHA's participation in the MTW Demonstration Program.
- (2) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in establishing a reasonable rent policy that is designed to encourage employment and self-sufficiency.
- (3) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to assist substantially the same total number of eligible low-income families as would have been served absent MTW throughout the PHA's participation in the MTW Demonstration Program.
- (4) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to maintain a comparable mix of families (by family size) as would have been provided had the funds not been used under the MTW Demonstration Program throughout the PHA's participation in the MTW Demonstration Program.
- (5) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure housing assisted under the MTW Demonstration Program meets housing quality standards established or approved by the Secretary throughout the PHA's participation in the MTW Demonstration Program.
- (6) The PHA published a notice that a hearing would be held, that the application and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the application by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the application and invited public comment.
- (7) The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the application by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the application.
- (8) The PHA certifies that the Board of Commissioners 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).
- (9) The PHA must certify that it will carry out its application in conformity with Title VI of the Civil Rights Act of 1964 (42 USC 2000d-2000d-4), the Fair Housing Act (42 USC 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 USC 794), and title II of the Americans with Disabilities Act of 1990 (42 USC 12101 et seq.), regulations implementing these authorities, and other applicable Federal, State, and local civil rights law and that it will affirmatively further fair housing, which means that

it will take meaningful actions to further the goals identified by the Assessment of Fair Housing conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Until such time as the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR part 91 the PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions. The PHA will carry out its plan in conformity with HUD's Equal Access Rule at 24 CFR 5.105(a)(2).

- (10) The application is consistent with the applicable Comprehensive Plan (or any plan incorporating such provisions of the Comprehensive Plan) for the jurisdiction in which the PHA is located.
- (11) The application contains a certification by the appropriate State or local officials that the application is consistent with the applicable Consolidated Plan, which incorporates a fair housing strategy that reflects the jurisdiction's Assessment of Fair Housing or Analysis of Impediments to Fair Housing Choice, as applicable, and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
- (12) The PHA affirmatively furthers fair housing. A PHA shall 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 fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; (iii) Specifies actions and strategies designed to address contributing factors, related fair housing issues and goals in the applicable Assessment of Fair Housing (AFH) consistent with 24 CFR 5.154, in a reasonable manner in view of the resources available; (iv) Works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) Operates programs in a manner consistent consolidated plan under 24 CFR Part 91, and with any order or agreement, to comply with the authorities, specified in paragraph (o)(1) of this section; (vi) Complies with any contribution or consultation requirement with respect to any applicable Analysis of Fair Housing, in accordance with 24 CFR 5.150-5.180; (vii) Maintains records reflecting these analyses, actions, and the results of these actions; and (viii) Takes steps acceptable to HUD to remedy known fair housing and civil rights violations. PHAs that are not yet required to submit an AFH shall adhere to the requirements under 24 CFR 903.7(o) in effect prior to August 17, 2015.
- (13) The PHA complies with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- (14) The PHA complies with the Architectural Barriers Act of 1968 and its implementing regulations at 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (15) The PHA complies 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.
- (16) The PHA complies with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (17) The PHA complies 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 and implementing regulations at 49 CFR Part 24.
- (18) The PHA complies 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.
- (19) The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (20) The 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 PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (21) With respect to public housing the 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.
- (22) The PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine

compliance with program requirements.

- (23) The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (24) The PHA will comply with the requirements of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Rewards at 2 CFR Part 200.
- (25) The application and all attachments are available at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Solano County Housing Authority

PHA NAME

CA131

PHA NUMBER/HA CODE

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

Terry Schmidtbauer

NAME OF AUTHORIZED OFFICIAL*

Executive Director

TITLE



SIGNATURE

12/1/20

DATE

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