

PHA Name : South Sioux City

PHA Code : NE175

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2021

PHA Program Type: Housing Choice Voucher (HCV) only

MTW Cohort Number: 1

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The South Sioux City Housing Authority (SSCHA) is located in South Sioux City, Nebraska, and services an area known as "Siouxland," which is the area that incorporates the Big Sioux River Basin in the states of South Dakota, Nebraska, and Iowa. The SSCHA provides affordable housing through the Housing Choice Voucher (HCV) Program to eligible low-income families, veterans, elderly, homeless, and people with disabilities. The HCV Program enables low-income families to select a rental unit, of their choice, in the area in which they choose to live. The SSCHA is committed to ensuring safe, decent, and affordable housing; creating opportunities for participant self-sufficiency and economic independence; and assuring the fiscal integrity of the Authority.

The vision of the SSCHA's Moving to Work (MTW) Program is to create a revolving door of assistance to low-income families through efficient internal operations and the achievement of participant self-sufficiency. As the SSCHA is able to streamline its processes and become more productive, it allows the SSCHA to focus on creating services and programs that foster self-sufficiency within its participant population. As more and more participants reach self-sufficiency, and ultimately leave the program, the SSCHA is in position to continually help low-income families with affordable housing.

The MTW program allows the SSCHA to achieve greater cost effectiveness in the use of federal resources, support families on the road to self-sufficiency, and increase affordable housing choices for its participants. The SSCHA plans to recreate itself anew through the introduction of new policies, programs, and services using the Block Grant. The SSCHA also seeks for its participants to achieve self-sufficiency, which is defined as the ability to pay a majority of the rent or being able to leave the HCV program completely. And lastly, the SSCHA will increase its affordable housing options for its participants as the MTW demonstration progresses.

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)	Currently Implementing
l. Fixed Subsidy (HCV)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Currently Implementing
o. Initial Rent Burden (HCV)	Not Currently Implemented
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)	Currently Implementing
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
3. Reexaminations	
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
d. Self-Certification of Assets (HCV)	Not Currently Implemented
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Not Currently Implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	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)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
10. Family Self-Sufficiency Program with MTW Flexibility	
a.HCV Waive Operating a Required FSS Program (HCV)	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)	Currently Implementing
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 South Sioux City Plans to Implement in the Submission Year or Is Currently Implementing

1.j. - Alternative Utility Allowance (HCV)
The SSCHA will streamline its recertifications by employing a standard utility allowance for its HCV households. This act will reduce staff hours by calculating the difference in unit types and sizes, thus allowing staff to focus on other matters going on in the office. The allowance will be an average of bedroom size. Additionally, it will allow the tenant portion of rent to increase helping households to realize a more market rate rent. Our Admin plan states it will be updated yearly, if there has been a 10% or more of the cost from the prior year.
This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency
This MTW activity serves the following statutory objectives: Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
N\A
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, South Sioux City MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
The SSCHA will streamline its recertification's by employing a standard utility allowance for its HCV households based on the bedroom size. This act will reduce staff hours, allowing staff to focus on other matters. Additionally, it will allow the tenant portion of rent to increase helping households to realize a more market rate rent.

1.n. - Utility Reimbursements (HCV)
The SSCHA will eliminate the utility reimbursements when the utility allowance is greater than the total tenant payment. The goal is to increase revenue for the authority, while making participants more self-reliant.

During the last 10 months of FY21, the SSCHA gave expended \$21,823 in utility reimbursements that assisted approximately 53 households. The SSCHA issued 281 utility reimbursement checks which equated to an average monthly utility reimbursement of \$78 per household. The yearly average reimbursement was \$412 per household. There were approximately 53 households that paid \$0 in rent due to their utility reimbursement. Once this activity takes effect, these households must pay at the minimum rent of \$50 regardless of their utility allowance. The SSCHA will realize a minimum of \$21,823 in cost savings and anticipates at least a \$40,000 cost savings during the first year in which this activity is implemented.

This MTW activity serves the following statutory objectives:
Cost effectiveness

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

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

N/A

No hardship were requested in the most recent fiscal year.

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

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

This activity is not currently going to be implemented. Any information that remains is an artifact of the activity being previously selected for implementation. This display issue will be fixed in a future release.

Following inclusions or exclusions will be eliminated, modified, or added.

2.b. - Payment Standards- Fair Market Rents (HCV)

The SSCHA will raise the payment standard to 120% of the Fair Market Rents (FMR). Housing choices are dwindling due to growing local market rents, and this limits where SSCHA households can live. This activity is a remedy to this concern.

The current SSCHA payment standard for one and two bedrooms is 110% of the FMR. The current SSCHA payment standard for three and four bedrooms is 100% of the FMR. A payment standard of 120% of FMR for one and two bedrooms will increase the payment standard by an average of \$73. A payment standard of 120% of FMR for three and four bedrooms will increase the payment standard by an average of \$217. The SSCHA will realize an average payment standard increase of \$145 for all bedroom sizes.

This MTW activity serves the following statutory objectives:
Housing choice

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 to all assisted households

N/A

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

Attached Hardship policy applies to: 2.b. - Payment Standards- Fair Market Rents (HCV)
3.b. - Alternative Reexamination Schedule for Households (HCV)
12.b. - Work Requirement (HCV)}

The hardship policy has been modified based on following considerations:
The HA added disability status onto the policy.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, South Sioux City MTW agency
Received 0 hardship requests
Approved hardship requests

Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
Following will explain the payment standards by FMR:

3.b. - Alternative Reexamination Schedule for Households (HCV)
The SSCHA will decrease the frequency of tenant reexaminations from annual to biennial for its elderly and disabled population. This restructuring will allow participants to have a more consistent rent portion over a longer period of time, and it will create more time for the SSCHA staff to attend to other business affairs.
Interim recertification's will be limited to one interim per year at the request of the household. If the interim is for a decrease in income, only income decreases of 10% or more will be processed. Interim decreases will be limited to one during a calendar year and no interim decreases during the first six months after initial occupancy. Required interim recertification for household composition changes or landlord rent increases will not count against the limit on voluntary interim recertification's.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types
The MTW activity applies to all tenant-based units
N\A
This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
Attached Hardship policy applies to: 2.b. - Payment Standards- Fair Market Rents (HCV) 3.b. - Alternative Reexamination Schedule for Households (HCV) 12.b. - Work Requirement (HCV)}
The hardship policy has been modified based on following considerations: Added Disability status
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, South Sioux City 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.
Required interim recertifications for household composition changes or landlord rent increases will not count against the limit on voluntary interim recertifications.

12.b. - Work Requirement (HCV)
The SSCHA will implement a work requirement for its non-elderly and non-disabled individuals. Able-bodied heads of household must work a minimum of 15 hours per week. All other abled-bodied household members, aged 18 years and older, must also work a minimum of 15 hours per week as well. Elderly and/or disabled individuals will be exempt from this activity. All other abled-bodied household members, aged 18 years and older, who are a member of an elderly and/or disabled household must work a minimum of 15 hours per week. Full-time students, live-in aides, individuals that are the primary caretaker for a child under 6 years of age, and women who are pregnant are exempt.

<p>This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency</p>
<p>This MTW activity serves the following statutory objectives: Increased revenue Decreased expenditures</p>
<p>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</p>
<p>This MTW activity applies to: New admissions and currently assisted households</p>
<p>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</p>
<p>The MTW activity applies to all tenant-based units</p>
<p>N\A</p>
<p>This MTW activity requires a Hardship Policy. The Hardship Policy is attached.</p>
<p>No hardship were requested in the most recent fiscal year.</p>
<p>In the prior year, under this activity, South Sioux City MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.</p>
<p>This MTW activity requires an Impact Analysis. The Impact Analysis is attached.</p>
<p>The following counts as work under this activity: Part-time, full-time, and seasonal employment</p>
<p>The following is how will the MTW agency monitor compliance: Compliance will be monitored annually, by the SSCHA, at recertifications. Compliance will also be monitored through the clients, as any changes to household income and/or composition must be reported to the SSCHA within 10 days.</p>
<p>The following supportive services are offered to support households: Supportive services will be offered through partnerships within the SSCHA's Growing Community Connections organization.</p>
<p>The following is how the agency address noncompliance with the work requirement policy: Clients will have 10 days to report non-compliance. If the lack of compliance is not due to a hardship, the SSCHA will issue a written warning and the client must gain employment within six months. The SSCHA will also refer the client to the Growing Community Connections (GCC) organization for services, of which the client must attend. The client must check in monthly with the SSCHA regarding the progress of his/her job search. If in good faith the client has not obtained employment in six months, the SSCHA will extend the job search for another 60 days. If the client has not obtained employment in six months, has failed to check-in with the SSCHA, and has failed to participate in the GCC program, the SSCHA will terminate the client's participation in the HCV program.</p>
<p>If the client fails to give notice within 10 days, the client will receive a "curable" deficiency notice from the SSCHA stating the client's non-compliance. Additionally, the letter will state the requirements for the client, which includes finding employment within 90 days, checking in monthly with the SSCHA, and partaking in services within the GCC program. If in good faith the client has not obtained employment in three months, the SSCHA will extend the job search for another 30 days. If the client has not obtained employment in three months, has failed to check-in with the SSCHA, and has failed to participate in the GCC program, the SSCHA will terminate the client's participation in the HCV program.</p>
<p>If the client fails to give notice within 10 days, the client will receive a "curable" deficiency notice from the SSCHA stating the client's non-compliance. If the client completely disregards the "curable" deficiency notice, the SSCHA will terminate the client's participation in the HCV program.</p>
<p>148 households are currently subject to the policy.</p>
<p>0 households were sanctioned for non-compliance with the work requirement in the most recently completed PHA fiscal year.</p>

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	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
	80%-50% Area Median Income	0
	49%-30% Area Median Income	0
	Below 30% Area Median Income	0
	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.	0 # of unit months
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	0 # of unit months

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

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

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	0
2 Person	0
3 Person	0
4 Person	0
5 Person	0
6+ Person	0
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.	

I.	Evaluations.
No known evaluations.	

SOUTH SIOUX CITY HOUSING AUTHORITY HARDSHIP POLICY

The SSCHA has established a hardship policy to evaluate individual circumstances to address hardship exemption requests.

Applicable Family Situations

Qualifying hardships include the following:

1. The family has experienced a decrease in income because of changed circumstances including,
 - a. Involuntary loss or reduction of employment
 - b. Death in the family
 - c. Involuntary reduction in or loss of earnings or other assistance
 - d. Seeking Disability status
2. The family has experienced an increase in expenses because of changed circumstances, for
 - a. Medical costs that exceed 25% or more of the family's current expense
 - b. Childcare costs that exceed 25% or more of the family's current expense
 - c. Involuntary loss of transportation, such as a serious car accident
 - d. Education
 - e. Similar items
 - f. Such other situations and factors determined by the SSCHA to be appropriate.

Process for Agency Review and Determination

When a participant requests a hardship exemption from an MTW activity the SSCHA will take the following actions:

1. Suspend the MTW activity beginning the next month after the request until the agency has determined if the request is warranted.
2. Determine whether a hardship exists within a reasonable time after the family request and whether it is temporary or long term.
3. The SSCHA will not evict the family during the 90-day period beginning the month following the family's request for a hardship exemption.
4. If it is determined that a financial or other hardship exists and is **TEMPORARY**, the SSCHA will continue providing an exemption from the MTW activity at a reasonable level for up to 90 days. After that time, the SSCHA will reinstate the MTW activity from the beginning of the suspension. The SSCHA will offer the family a reasonable repayment agreement, on terms and conditions established by the SSCHA for the amount of back rent owed by the family.
5. If it is determined that a financial or other hardship exists and is **LONG-TERM**, the SSCHA will continue providing an exemption from the MTW activity at a reasonable level for a specified duration determined by the SSCHA. After that time, the SSCHA will reinstate the MTW activity from the beginning of the suspension. The SSCHA will offer the family a reasonable repayment agreement on terms and conditions established by the SSCHA for the amount of back rent owed by the family.
6. If it is determined that a financial or other hardship request did not meet hardship standards, the participant must resume the MTW activity and collect any retroactive rent, if applicable, through a reasonable repayment agreement.
7. Participant must supply Disability paperwork from the Social Security Department.

Resident Notification

The SSCHA will notify families of its Hardship Policy through its Administrative Plan, at intake, at recertification, and when a family is to be terminated due to an MTW activity.

Grievance Procedure

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

Reasonable Accommodations

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

Record Keeping

The SSCHA will keep clear records for hardship requests and determinations for five (5) years. These records are available for public review and inspection at the SSCHA's principal office during normal business hours and supplied to HUD if requested.

FY22 SSCHA Impact Analysis
Work Requirement

- 1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)**
The SSCHA will implement a work requirement for its non-elderly and non-disabled individuals aged 18 years and older. The tenant rent portion may increase as a result of this activity; however, it will be trivial, as many abled-bodied families are already working. This will proportionally affect the housing assistance payments (HAP) disbursed by the SSCHA. The decrease in HAP, paid by the SSCHA, will reduce federal expenditures.
- 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)**
A large number of able-bodied families at the SSCHA are already employed; therefore, the SSCHA does not anticipate this activity greatly impacting the affordability of its affected families. If it does, the SSCHA expects that it will be minimal.
- 3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)**
This activity will not affect the waiting list.
- 4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)**
This activity will not affect the termination rate of families.
- 5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program**
This activity will not affect the agency's current utilization rate in the HCV program.
- 6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice**
MTW Statutory Objective - Cost Effectiveness
This activity will incrementally increase the tenant rent portion for families and decrease the HAP issued by the SSCHA.

MTW Statutory Objective – Self Sufficiency
This activity will obligate abled-bodied individuals to work; thereby, allowing them to amass funds in preparation of program graduation.
- 7. Impact on the agency's ability to meet the MTW statutory requirements**
The SSCHA will be able to meet the statutory objectives of Cost Effectiveness and Self-Sufficiency.
- 8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity**
It is anticipated that this activity will not increase the number of hardship requests.
- 9. Across the other factors above, the impact on protected classes (and any associated disparate impact)**
This activity is based on able-bodied individuals, in which protected class is not a factor, and there is no anticipated impact on protected classes.

FY22 SSCHA Impact Analysis
Payment Standard – Fair Market Rents

- 1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)**
The SSCHA will raise the payment standard to 120% of the Fair Market Rents (FMR). It is anticipated that this activity will increase the SSCHA's federal expenditures in terms of housing assistance payments (HAP). The average HAP is projected to increase by \$145 per family, per month. Augmenting the payment standard for FMR will expand housing choices for families and deconcentrate poverty.
- 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)**
Families will, similarly, see an increase in their tenant rent portion; however, it will be insubstantial. Due to increases in local market rents, all families will see an increase in rent regardless of their income status.
- 3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)**
This activity will not affect the waiting list.
- 4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)**
This activity will not affect the termination rate of families.
- 5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program**
Due to an increase in HAP, this activity may affect the agency's current utilization rate in the HCV program. It is the expectation that this activity will have a neutral effect on the HCV utilization rate when combined and implemented with the other SSCHA MTW activities.
- 6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice**
MTW Statutory Objective – Housing Choice
This activity will enlarge the pool of available and affordable housing choices from which a family can choose.
- 7. Impact on the agency's ability to meet the MTW statutory requirements**
The SSCHA will be able to meet the statutory objective of Housing Choice.
- 8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity**
The SSCHA does not expect to see an increase in hardship requests as a result of this activity.
- 9. Across the other factors above, the impact on protected classes (and any associated disparate impact)**
This activity is based on income reviews, in which protected class is not a factor, and there is no anticipated impact on protected classes. Elderly and disabled participants are a protected class; however, this activity will not have a negative impact on them.

FY22 SSCHA Impact Analysis
Alternative Recertification Schedule

- 1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)**
The SSCHA will decrease the frequency of tenant reexaminations from annual to biennial for its elderly and disabled population. The SSCHA predicts that this activity will produce operational cost savings of about \$1,809.00, as staff are freed to manage other administrative affairs.
- 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)**
This activity will allow the SSCHA's elderly and disabled families to have a more consistent tenant rent portion over a longer period of time, which will consequently make the HCV program more affordable for families.
- 3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)**
This activity will not affect the waiting list.
- 4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)**
This activity will not affect the termination rate of families.
- 5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program**
This activity will not affect the agency's current utilization rate in the HCV program.
- 6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice**
MTW Statutory Objective - Cost Effectiveness
This activity will decrease the administrative costs associated with processing annual and interim recertifications.
- 7. Impact on the agency's ability to meet the MTW statutory requirements**
The SSCHA will be able to meet the statutory objective of Cost Effectiveness.
- 8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity**
The SSCHA does not expect to see an increase in hardship requests as a result of this activity.
- 9. Across the other factors above, the impact on protected classes (and any associated disparate impact)**
This activity is based on income reviews, in which protected class is not a factor, and there is no anticipated impact on protected classes. Elderly and disabled participants are a protected class; however, this activity will not have a negative impact on them.

FY22 SSCHA Impact Analysis
Payment Standard – Fair Market Rents

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

The SSCHA will raise the payment standard to 120% of the Fair Market Rents (FMR). It is anticipated that this activity will increase the SSCHA's federal expenditures in terms of housing assistance payments by the end of 2022 estimated to 1,203,964.00. We are anticipating also by the end of 2022 our PUC will increase 25.74 or 5.6% per the payment standard tool ran for effective date of 04/01/2022.

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)

Families could, similarly, see an increase in their tenant rent portion. Due to increases in local market rents, all families will see an increase in rent regardless of their income status. The FMR's will be increasing at least by \$30.00 in the year 2022 for our jurisdiction.

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

This activity will not affect the waiting list.

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

This activity will not affect the termination rate of families.

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

Due to an increase in HAP, this activity may affect the agency's current utilization rate in the HCV program. It is the expectation that this activity will have a neutral effect on the HCV utilization rate when combined and implemented with the other SSCHA MTW activities.

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

MTW Statutory Objective – Housing Choice

This activity will enlarge the pool of available and affordable housing choices from which a family can choose.

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

The SSCHA will be able to meet the statutory objective of Housing Choice.

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

The SSCHA does not expect to see an increase in hardship requests as a result of this activity.

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

This activity is based on income reviews, in which protected class is not a factor, and there is no anticipated impact on protected classes. Elderly and disabled participants are a protected class; however, this activity will not have a negative impact on them.

FY22 SSCHA Impact Analysis
Work Requirement

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

The SSCHA will implement a work requirement for its non-elderly and non-disabled individuals aged 18 years and older. The tenant rent portion may increase as a result of this activity; as many abled-bodied families are already working the HA are estimating that it should only be \$50-\$100 increase. This will proportionally affect the housing assistance payments (HAP) disbursed by the SSCHA. The decrease in HAP, paid by the SSCHA, will reduce federal expenditures.

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)

A large number of able-bodied families at the SSCHA are already employed; therefore, the SSCHA does not anticipate this activity greatly impacting the affordability of its affected families. If it does, the SSCHA expects that it will be minimal.

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

This activity will not affect the waiting list.

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

This activity will not affect the termination rate of families.

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

This activity will not affect the agency's current utilization rate in the HCV program.

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

MTW Statutory Objective - Cost Effectiveness

This activity will incrementally increase the tenant rent portion for families and decrease the HAP issued by the SSCHA.

MTW Statutory Objective – Self Sufficiency

This activity will obligate abled-bodied individuals to work; thereby, allowing them to amass funds in preparation of program graduation.

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

The SSCHA will be able to meet the statutory objectives of Cost Effectiveness and Self-Sufficiency.

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

It is anticipated that this activity will not increase the number of hardship requests.

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

This activity is based on able-bodied individuals, in which protected class is not a factor, and there is no anticipated impact on protected classes.



Housing Agency

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In all the Public Hearings there were 2 comments on the MTW plan.

1. I am on Social Security how will this affect me?
 - a. Explained the Alternative Reexamination schedule.
2. I am my brothers care giver and he is on Social Security how will this affect him?
 - a. Explained the Alternative Reexamination schedule, payment standard in case he wanted to move.

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 ~~07/01/2021~~ ^{07/01/2022} hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

South Sioux City Housing Authority

NE175

MTW PHA NAME

MTW PHA NUMBER/HA CODE

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

Patricia Wojcik

Chairwoman

NAME OF AUTHORIZED OFFICIAL

TITLE

Patricia Wojcik
SIGNATURE

10-28-21
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.*