

**PHA Name :** West Palm Beach Housing Authority

**PHA Code :** FL009

**MTW Supplement for PHA Fiscal Year Beginning :** (MM/DD/YYYY): 4/1/2023

**PHA Program Type:** Combined

**MTW Cohort Number:** Asset Building

**MTW Supplement Submission Type:** Amended Annual Submission

## **B. MTW Supplement Narrative.**

In our first year as an MTW Agency, the West Palm Beach Housing Authority's (WPBHA) seeks to build successful collaborations with community partners that will assist our program participants in moving towards economic self-sufficiency; building and strengthening their household assets, providing greater financial security, having better housing options, or achieving home ownership. This is at the core of activities we will undertake as part of the Asset Building cohort.

The WPBHA will also focus efforts on waivers which will deliver a reduction in the administrative burden experienced by our Housing Choice Voucher and Low Income Public Housing customers as well as our staff. Waivers sought in this Supplement include alternative recertification schedules, raising the minimum rent, allowing self-certification of assets up to \$50,000 and capturing new income types.

The process of identifying these waivers included multiple staff meetings seeking input and feedback, notice of a public meeting and making our MTW Supplement available for comment for the required 45-days. Evidence of our compliance with the MTW consultation process is included as an attachment to this submission.

Implementation of the MTW waivers included in this document represents a shift in our policy, procedures and practice. However, our mission to provide 'safe, decent and affordable housing to persons and families with limited financial resources and provide residents with access to programs which will assist them in making the transition to greater financial security' remains unchanged.

Monitoring of the proposed waivers will be undertaken through available systems such as PHAS, SEMAP and any other oversight tool available for such purposes. The WPBHA will embed practices which ensure our on-going compliance with the five (5) statutory requirements of MTW; (a) very low-income requirement, (b) reasonable rent policy, (c) substantially the same requirements, (d) comparable mix requirement and (e) housing quality standards. Specific analysis of affected statutory requirements is included as part of each waiver.

**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).**

<b>1. Tenant Rent Policies</b>	
e. Minimum Rent (PH)	Plan to Implement in the Submission Year
f. Minimum Rent (HCV)	Plan to Implement in the Submission Year
v. Alternative Income Inclusions/Exclusions (PH)	Plan to Implement in the Submission Year
w. Alternative Income Inclusions/Exclusions (HCV)	Plan to Implement in the Submission Year
<b>2. Payment Standards and Rent Reasonableness</b>	
<b>3. Reexaminations</b>	
a. Alternative Reexamination Schedule for Households (PH)	Plan to Implement in the Submission Year
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
c. Self-Certification of Assets (PH)	Plan to Implement in the Submission Year
d. Self-Certification of Assets (HCV)	Plan to Implement in the Submission Year
<b>4. Landlord Leasing Incentives</b>	
<b>5. Housing Quality Standards (HQS)</b>	
<b>6. Short-Term Assistance</b>	
<b>7. Term-Limited Assistance</b>	
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	
<b>9. Project-Based Voucher Program Flexibilities</b>	
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
<b>11. MTW Self-Sufficiency Program</b>	
<b>12. Work Requirement</b>	
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
<b>14. Moving on Policy</b>	
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
<b>17. Local, Non-Traditional Activities</b>	

**C. MTW Activities Plan that West Palm Beach Housing Authority Plans to Implement in the Submission Year or Is Currently Implementing**

<p><b>1.e. - Minimum Rent (PH)</b></p> <p><b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b></p> <p>To be implemented in the MTW Supplement submission year, WPBHA plans to increase its minimum rent from \$50 to \$130 across both the WPBHA's Housing Choice Voucher and Low-Income Public Housing programs. Raising the minimum rent to \$130 is more in line with current market conditions and expectations. Families with a an elderly or disabled head-of-household will be excluded from the minimum rent policy.</p> <p>The raise in minimum rent targets non-disabled, non-elderly, typically-working households and will be largely offset by the introduction of biennial recertifications which means working households will not have to declare any income increases between reexaminations.</p> <p>All other households will be required to pay the minimum rent unless they request consideration under the hardship policy. As detailed in the impact analysis, the WPBHA plans to work with households to transition to the new minimum rent.</p> <p>The WPBHA has an established rent reasonableness policy within its HCV Administration Plan and it will continue to apply this methodology when supporting households to find, and keep, suitable housing.</p> <p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness</p>
--

<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Neutral (no cost implications)</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p><b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b></p> <p>New admissions and currently assisted households</p>
<p><b>Does the MTW activity apply to all family types or only to selected family types?</b></p> <p>The MTW activity applies only to selected family types</p>
<p><b>Please select the family types subject to this MTW activity.</b></p> <p>Non-elderly, non-disabled families</p>
<p><b>Does the MTW activity apply to all public housing developments?</b></p> <p>The MTW activity applies to specific developments</p>
<p><b>Which developments participate in the MTW activity?</b></p> <p>The minimum rent requirement applies to FL009000056 Dunbar Village Project (a.k.a. Sabal Palm) LIPH site only.</p> <p>FL009000022 Southridge LIPH site is excluded from this waiver as it exclusively supports elderly households.</p>
<p><b>Does this MTW activity require a hardship policy?</b></p> <p>Yes</p> <p>This document is attached.</p>
<p><b>Does the hardship policy apply to more than this MTW activity?</b></p> <p>Yes</p>
<p><b>Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</b></p> <p>1.e. - Minimum Rent (PH); 1.f. - Minimum Rent (HCV); 3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)</p>
<p><b>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</b></p> <p>No</p>
<p><b>How many hardship requests have been received associated with this activity in the past year?</b></p> <p>No hardship were requested in the most recent fiscal year.</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>Does the MTW activity require an impact analysis?</b></p>

<p>Yes</p> <p>This document is attached.</p>
<p><b>Does the impact analysis apply to more than this MTW activity?</b></p> <p>Yes</p>
<p><b>Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)</b></p> <p>1.f. - Minimum Rent (HCV)</p>
<p><b>How much is the minimum rent or minimum Total Tenant Payment (TTP)?</b></p> <p>\$130.00</p>

<p><b>1.f. - Minimum Rent (HCV)</b></p>
<p><b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b></p> <p>To be implemented in the MTW Supplement submission year, WPBHA plans to increase its minimum rent from \$50 to \$130 across both the WPBHA's Housing Choice Voucher and Low-Income Public Housing programs. Raising the minimum rent to \$130 is more in line with current market conditions and expectations. Families with an elderly or disabled head-of-household will be excluded from the minimum rent policy.</p> <p>The raise in minimum rent targets non-disabled, non-elderly, typically working households and will be largely offset by the introduction of biennial recertifications which means working households will not have to declare any income increases between reexaminations.</p> <p>All other households will be required to pay the minimum rent unless they request consideration under the hardship policy. As detailed in the impact analysis, the WPBHA plans to work with households to transition to the new minimum rent.</p> <p>The WPBHA has an established rent reasonableness policy within its HCV Administration Plan and it will continue to apply this methodology when supporting households to find, and keep, suitable housing.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Neutral (no cost implications)</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p><b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b></p> <p>New admissions and currently assisted households</p>
<p><b>Does the MTW activity apply to all family types or only to selected family types?</b></p> <p>The MTW activity applies only to selected family types</p>
<p><b>Please select the family types subject to this MTW activity.</b></p>

Non-elderly, non-disabled families
<b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b> The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
<b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b> All tenant based and properties with project-based vouchers are included in this MTW Activity.
<b>Does this MTW activity require a hardship policy?</b> Provided Already
<b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b> No
<b>Does the MTW activity require an impact analysis?</b> Provided Already
<b>How much is the minimum rent or minimum Total Tenant Payment (TTP)?</b> \$130.00

<b>1.v. - Alternative Income Inclusions/Exclusions (PH)</b>
<b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b> Implementation of this waiver enables the WPBHA's income calculations to better reflect the changing technologies and methods of income payment. It will also provide clarity to staff and promote consistency of practice. Cash App/Zelle/YouTube/Venmo (and similar) payments will be included in income calculations when they are consistent payments and, in line with the newly introduced IRS rule, total \$600 or more regardless of how many payments this constitutes.  This information, most likely identified through tenant bank statements, will be used to supplement the income information provided by the Enterprise Income Verification System. Significant discrepancies will be investigated by the WPBHA.  This waiver will be implemented in the MTW Supplement submission year.
<b>Which of the MTW statutory objectives does this MTW activity serve?</b> Cost effectiveness
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b> Neutral (no cost implications)
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b> The MTW activity applies only to a subset or subsets of assisted households
<b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b>

New admissions and currently assisted households
<b>Does the MTW activity apply to all family types or only to selected family types?</b> The MTW activity applies only to selected family types
<b>Please select the family types subject to this MTW activity.</b> Non-elderly, non-disabled families
<b>Does the MTW activity apply to all public housing developments?</b> The MTW activity applies to specific developments
<b>Which developments participate in the MTW activity?</b> This waiver applies to FL009000056 Dunbar Village Project (a.k.a. Sabal Palm) LIPH site. FL009000022 Southridge LIPH site is excluded from this waiver as it exclusively supports elderly households.
<b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b> No
<b>What inclusions or exclusions will be eliminated, modified, or added?</b> Cash App/Zelle/YouTube/Venmo (and similar) payments will be included in income calculations when they are consistent payments and, in line with the newly introduced IRS rule, total \$600 or more regardless of how many payments this constitutes.

<b>1.w. - Alternative Income Inclusions/Exclusions (HCV)</b>
<b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b> Implementation of this waiver enables the WPBHA's income calculations to better reflect the changing technologies and methods of income payment. It will also provide clarity to staff and promote consistency of practice. Cash App/Zelle/YouTube/Venmo (and similar) payments will be included in income calculations when they are consistent payments and, in line with the newly introduced IRS rule, total \$600 or more regardless of how many payments this constitutes.  This information, most likely identified through tenant bank statements, will be used to supplement the income information provided by the Enterprise Income Verification System. Significant discrepancies will be investigated by the WPBHA.  This waiver will be implemented in the MTW Supplement submission year.
<b>Which of the MTW statutory objectives does this MTW activity serve?</b> Cost effectiveness
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b> Neutral (no cost implications)
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b> The MTW activity applies only to a subset or subsets of assisted households

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

**Please select the family types subject to this MTW activity.**

Non-elderly, non-disabled families

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

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

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

All tenant-based units and properties with project-based vouchers are included in this MTW activity.

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

No

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

Cash App/Zelle/YouTube/Venmo (and similar) payments will be included in income calculations when they are consistent payments and, in line with the newly introduced IRS rule, total \$600 or more regardless of how many payments this constitutes.

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

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

The WPBHA intends to implement the alternative reexamination schedule for LIPH and HCV households:

- Reexaminations will take place every two years for HCV and LIPH households.
- Increases in income between annual reexaminations will be disregarded until the next scheduled reexamination.
- Decreases in income are limited to one interim decrease during a calendar year and no interim decreases during the first six months after initial occupancy. FSS households are exempt from this provision and are able to complete an interim recertification at any time.
- The WPBHA will waive the limit on interim income recertifications during periods of declared emergencies.
- All other interim changes to household will continue as required (e.g. change in household composition).
- Households that claim to have 'zero income' when they are otherwise considered able to work will continue to meet with WPBHA staff regularly (minimum annually).
- Families may request more frequent reexaminations if they believe this would be beneficial.

This waiver will significantly reduce the administrative burden on our staff and customers, especially given a majority of our LIPH households are on fixed income and not subject to the degree of changes to income experienced by working households between recertifications.

Increased revenue is expected from initial savings due to reduced payments to third party provider to remedy 50058 errors.

This waiver will be implemented in the MTW Supplement submission year.

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

Cost effectiveness; Self-sufficiency; Housing choice



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

Increased revenue

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

The MTW activity applies to all assisted households

**Does this MTW activity require a hardship policy?**

Provided Already

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

No

**Does the MTW activity require an impact analysis?**

Yes

This document is attached.

**Does the impact analysis apply to more than this MTW activity?**

Yes

**Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)**

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

**What is the recertification schedule?**

Once every two years

**How many interim recertifications per year may a household request?**

1

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

The WPBHA plans to limit the number of interim recertifications requested following a decrease in income to one. Increases in income are no longer be required to be reported.

Changes in family/household circumstances will continue to be reported whenever a change occurs e.g. when someone wants to join/leave the household.

Families who claim to have zero income will continue to meet with WPBHA staff regularly (minimum annually). These households are still required to submit an interim recertification when they first receive an income. These households will then move to biennial recertifications.

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

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

The WPBHA intends to implement the alternative reexamination schedule for working households and households on fixed income:

- Reexaminations will take place every two years for HCV and LIPH households.
- Households on zero income will be required to undergo more regular reexaminations.
- Increases in income between annual reexaminations will be disregarded until the next scheduled reexamination.
- Decreases in income are limited to one during a calendar year and no interim decreases during the first six months after

initial occupancy. FSS households are exempt from this provision and are able to complete an interim recertification at any time.

- All other interim changes to household will continue as required (e.g. change in household composition).
- Families that claim to have zero income will continue to meet with WPBHA staff regularly (minimum annually).
- Families may request more frequent reexaminations if they believe this would be beneficial.

This waiver will significantly reduce the administrative burden on our staff and customers. It is also expected to provide greater incentive to work and as families will not be immediately subject to a rent increase when their income increases. Packaged with other activities aimed at self-sufficiency, the WPBHA is committed to incentivizing families to increase their savings and financial independence.

Increased revenue is expected from initial savings due to reduced payments to third party provider to remedy 50058 errors. This waiver will be implemented in the MTW Supplement submission year.

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

Cost effectiveness; Self-sufficiency; Housing choice

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

Increased revenue

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

The MTW activity applies to all assisted households

**Does this MTW activity require a hardship policy?**

Provided Already

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

No

**Does the MTW activity require an impact analysis?**

Provided Already

**What is the recertification schedule?**

Once every two years

**How many interim recertifications per year may a household request?**

1

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

The WPBHA plans to limit the number of interim recertifications requested following a decrease in income to one. Increases in income are no longer be required to be reported.

Changes in family/household circumstances will continue to be reported whenever a change occurs e.g. when someone wants to join/leave the household. FSS households are exempt from limited interim recertifications.

Families who claim to have zero income will continue to meet with WPBHA staff regularly for recertification (minimum annually). These households are still required to submit an interim recertification when they start to receive an income. These households will then move to biennial recertifications.

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

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

Enabling assisted families to self-certify their assets up to \$50,000 is consistent with the WPBHA's streamlining of income calculation processes. It reduces the administrative burden on both our customers and our staff.

This waiver will be implemented in the MTW Supplement submission year.

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

Cost effectiveness; Self-sufficiency

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

No

**Please state the dollar threshold for the self-certification of assets.**

\$50,000.

### 3.d. - Self-Certification of Assets (HCV)

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

Enabling assisted families to self-certify their assets up to \$50,000 is consistent with the WPBHA's streamlining of income calculation processes. It reduces the administrative burden on both our customers and our staff.

This waiver will be implemented in the MTW Supplement submission year.

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

Cost effectiveness; Self-sufficiency

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

No

**Please state the dollar threshold for the self-certification of assets.**

\$50,000.



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

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

<b>F.</b>	<b>Public Housing Operating Subsidy Grant Reporting.</b>
<b>F.1</b>	<p>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.</p>

<b>Federal Fiscal Year (FFY)</b>	<b>Total Operating Subsidy Authorized Amount</b>	<b>How Much PHA Disbursed by the 9/30 Reporting Period</b>	<b>Remaining Not Yet Disbursed</b>	<b>Deadline</b>
2022	\$660,003	\$492,132	\$167,871	

<b>G.</b>	<b>MTW Statutory Requirements.</b>
<b>G.1</b>	<p><b>75% Very Low Income – Local, Non-Traditional.</b></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>
<b>Income Level</b>	<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
80%-50% Area Median Income	
49%-30% Area Median Income	
Below 30% Area Median Income	
Total Local, Non-Traditional Households	<b>0</b>

\*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.

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>

<b>G.3</b>	<b>Substantially the Same (STS) – Local, Non-Traditional.</b>
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?

<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>
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.	
<b>Occupied Number of Local, Non-Traditional units by</b>	

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.

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning ( 4/01/2023 ), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

WEST PALM BEACH HOUSING AUTHORITY

FL009

**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).*

Denise Smith-Barnes

Chairperson

**NAME OF AUTHORIZED OFFICIAL****TITLE****SIGNATURE**

07/19/2023

**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.*

# LOCALiQ

The Gainesville Sun | The Ledger  
Daily Commercial | Ocala StarBanner  
News Chief | Herald-Tribune  
News Herald | The Palm Beach Post  
Northwest Florida Daily News

PO Box 631244 Cincinnati, OH 45263-1244

## PROOF OF PUBLICATION

West Palm Beach Housing Authority  
West Palm Beach Housing Authority  
3700 GEORGIA AVE  
WEST PALM BEACH FL 33405

STATE OF WISCONSIN, COUNTY OF BROWN

Before the undersigned authority personally appeared, who on oath says that he or she is the Legal Coordinator of the Palm Beach Post, published in Palm Beach County, Florida; that the attached copy of advertisement, being a Public Notices, was published on the publicly accessible website of Palm Beach County, Florida, or in a newspaper by print in the issues of, on:

05/21/2023

Affiant further says that the website or newspaper complies with all legal requirements for publication in chapter 50, Florida Statutes.

Subscribed and sworn to before me, by the legal clerk, who is personally known to me, on 05/21/2023

Legal Clerk

Notary, State of WI, County of Brown

My commission expires

Publication Cost: \$139.05

Order No: 8836488

Customer No: 730562

PO #:

# of Copies:

1

05-21/2023

**THIS IS NOT AN INVOICE!**

*Please do not use this form for payment remittance.*

## LEGAL NOTICE

### Notice of Comment Period and Public Hearing Amendments to the West Palm Beach Housing Authority's Moving To Work (MTW) Supplement

The West Palm Beach Housing Authority (WPBHA) intends to submit an amended MTW Supplement to the Department of Housing and Urban Development.

The WPBHA seeks public input on its draft MTW Supplement. The public comment period for the draft MTW Supplement is from Friday, May 19th, 2023 until Wednesday, July 5th, 2023.

Effective Friday, May 19th, 2023, the draft plan will be available for public inspection on the WPBHA's website at [www.wpbha.org](http://www.wpbha.org) or at 3700 Georgia Avenue, West Palm Beach, FL 33405 (10:00 a.m. through 4:30 p.m., Monday through Friday). A public meeting to invite and discuss comments on the draft MTW Supplement will be held Thursday, June 29th, 10 a.m. – 12 p.m. at 3801 Georgia Avenue, West Palm Beach, FL 33405. Public participation in the process is encouraged. Attendance at the public hearing is not mandatory. Questions and comments must be submitted in writing to Katy Smith by email to: [ksmith@wpbha.org](mailto:ksmith@wpbha.org) no later than 4 p.m. Wednesday, July 5th, 2023. All comments must be submitted by the close of the comment period. Comments received after the close of the comment period will not be considered.

RYAN SPELLER  
Notary Public  
State of Wisconsin





**Amended Moving-to-Work Supplement  
Public Meeting**

**Meeting** 10:00 a.m., Thursday 29<sup>th</sup> June, 2023  
3801 Georgia Avenue, West Palm Beach

**Minutes**

WPBHA Representatives: Ms. Mercedes Rodas, Director of Housing Financial Services  
Ms. Katy Smith, Housing Management Analyst  
Other attendees: None

Public meeting was ready to commence at scheduled time of 10:00 a.m.

WPBHA Representatives remained at location for one hour in the event a member of the public arrived. No members of the public attended.

Meeting was brought to a close at 11:00 a.m.

**Moving to Work Program Workshop (Tuesday 18<sup>th</sup> April, 2023 9:00 a.m. to 12:00 p.m.)**

Facilitator: Linda Odum, Executive Director

Note-taker: Katy Smith, Housing Management Analyst

Attendees: Asset Management and Housing Choice Voucher Staff (see sign in sheet)

Discussion notes

Ms. Linda Odum, Executive Director gave a presentation to staff outlining the moving to work principles, the concept of waivers and what the Agency is considering implementing in year 1 as well as the Asset Building cohort.

Staff raised a number of questions in relation to the proposed waivers. Summary of questions and responses below.

*Self-certification of assets under \$50,000.*

Staff raised no issues with this waiver.

*Alternative recertification schedule.*

Staff stated that triennial recertifications for households on a fixed income was too much time between recertifications. Triennial recertifications were therefore removed from consideration.

Staff provided feedback that biannual recertification should be for working households and households on fixed income. This approach was adopted in the subsequent MTW Supplement. Staff were also concerned about how people on zero income would be managed through this schedule. The approach to exclude people on zero income from the alternative recertification schedule was adopted.

*Removal of Utility Payments*

Staff did not have any feedback on this waiver.

*Minimum Rent Waiver*

Staff were positive about increasing minimum rent (excluding elderly or disabled households).

*Alternative Income inclusions/exclusions waiver*

Staff indicated that guidance regarding processing multiple Venmo, Cash App (and similar) payments would be useful although they were not sure it needed to be a waiver. Staff were asked to consider different types of payments they are seeing and to provide further feedback at a later date.

*Asset Building Cohort Opt-out saving account*

Staff expressed concern that participants would just be given money with no program requirements or obligations. In the discussion it was acknowledged that it is a very new way of supporting our customers. It is a HUD priority to understand the impacts of such a program. We are working to design a supportive asset building program, and while we cannot require anything of the families chosen to participate, we can incentivize them to work towards financial goals.

### **Housing Choice Voucher Program - Staff meeting 10<sup>th</sup> May**

Ms. Katy Smith, Housing Management Analyst attended the monthly HCV Staff meeting to provide an on MTW activities.

Staff were advised that the Agency is no longer progressing removal of utility allowance in Year 1 in order to allow the assessment of the impact of raising the minimum rent first. However, all other waivers are progressing as previously discussed.

Staff agreed that income inclusion/exclusion waiver should align with advice from IRS regarding what is considered income from on-line payment systems.

HCV staff shared their concerns regarding biannual recertifications. The two main concerns were 1) the support that would be provided to staff when implementing this new program and 2) how to prevent fraudulent behavior of participants who will not be required to certify their income as regularly.

Staff were advised that the waiver would not be implemented without the proper IT systems, policy and procedures to support it. This work will be done with the input of staff and they will be provided with regular updates.

Staff were also advised that as we develop these procedures and policies we will have greater clarity on how to respond to the multiple scenarios raised by staff particularly those related to fraudulent behavior. Staff were reminded that existing checks and balances in place would remain and that people who do not have an income will continue to have more regular recertifications.

Staff asked if reducing the administrative burden was a first step to reducing staff. Staff were advised that under no circumstances is the implementation of MTW waivers an action to reduce staffing levels. The reduction of administrative burden was to create the space for staff to develop new and innovative ideas that they would otherwise not have time to undertake.

# Amendments to the West Palm Beach Housing Authority's Moving To Work (MTW) Supplement

The West Palm Beach Housing Authority (WPBHA) intends to submit an amended MTW Supplement to the Department of Housing and Urban Development.

The WPBHA seeks public input on its draft amended MTW Supplement. The public comment period for the draft amended MTW Supplement will begin Friday, May 19<sup>th</sup>, 2023 until Wednesday, July 5<sup>th</sup>, 2023. In addition to providing feedback online, you may also visit our office at the [3700 Georgia Avenue, West Palm Beach, FL 33405](#) (10:00 a.m. through 4:30 p.m., Monday through Friday) to review the document.

A public meeting to invite and discuss comments on the draft MTW Supplement will be held Thursday, June 29<sup>th</sup>, 10 a.m. – 12 p.m. @ at [3801 Georgia Avenue, West Palm Beach, FL 33405](#). **Public participation in the process is encouraged.** Attendance at the public hearing is not mandatory.

Questions and comments may be submitted below no later than 4 p.m. Wednesday, July 5<sup>th</sup>, 2023. All comments must be submitted by the close of the comment period. **Comments received after the close of the comment period will not be considered.**



Your Name\*

Email\*

Phone\*

Feedback\*?

☐

I'm not a robot



reCAPTCHA  
[Privacy](#) - [Terms](#)

**SUBMIT**

## MTW Waiver Impact Analysis: Alternative Reexamination Schedule (LIPH and HCV)

One full time employee responsible for all reexaminations and interim examinations for LIPH properties. This waiver will not impact Asset Management staffing levels.

The HCV program currently has 12 full time employees managing active vouchers. This waiver will not impact HCV staffing levels.

As demonstrated in the below Delinquency report (PIC data 9/21/2023), the WPBHA meets its 50058 reporting targets across both programs. By moving to a biennial reexamination schedule the WPBHA will automatically reduce the administrative burden on staff and our households by 50% in the impacted programs. This, coupled with the households ability to save income increases in between recertifications, provides space for staff and management to explore innovative ways to best support our households as they build self-sufficiency and improve their housing choices.

## Delinquency Report

As of August 31 2023

Level Of Information Field Office

Effective Start Date May 01 2022

Effective End Date August 31 2023

Field Office/s: 4DPH:FLORIDA STATE OFFICE

HA Code	HA Name	HA FYE	Program	ACC Units	VMS Units Leased	As of	50058 Required	50058 Received	Difference	Reporting Rate
FL009	WEST PALM BEACH HOUSING	31-Mar	Public Housing	157			153	149	4	97.39
FL009	WEST PALM BEACH HOUSING	31-Mar	Voucher Funded Assistance	4009	3258	07/23	3209	3292	-83	102.59

*Planned activities to mitigate negative impact*

As with any frequency of recertification, there is a risk that households will underreport their income. The WPBHA will continue to investigate underreporting, income discrepancies between EIV and self-reported income as well as potential fraud.

Households that report no-income, and have no income evident on EIV, despite being eligible to work, will be exempt from biennial recertifications and will be required to attend more frequent meetings with the WPBHA program representative to discuss their income. These households will move to biennial recertifications only after they have gained employment.

All LIPH and HCV households will be notified of the change to biennial recertifications, the reporting requirements that have changed, the limitations on interim decreases and access to the hardship policy. This information will be reinforced at each recertification and when households contact the WPBHA to report changes.

The rate of hardship requests under this waiver will be closely monitored in the first 12 months, particularly the impact of the limitations on processing income decreases in between recertification.

### *Housing Choice Voucher Program*

Using the PIC data below, with elderly and disabled head of households removed, 20% of households that are within the scope of this waiver pay between \$0-\$130 TTP. The full list of impacted households is provided as an attachment.

MTCS Adhoc Report

Program Type: All Voucher Funded Assistance

Housing Authority : FL009 WEST PALM BEACH HOUSING

Effective Start Date : 03/25/2022

Effective End Date : 09/25/2023

Non-Elderly, Non-Disabled, Work-able households (in-scope households)	
Total # of households in-scope for \$130 min rent	1261
Total # of in-scope households currently below \$130 TTP	253
% of in-scope households currently below \$130 TTP	20%

#### Breakdown of in-scope households currently below \$130 TTP:

Program	TTP amount	Number of Households
HCV	\$41	1
HCV	\$50	149
HCV	\$51 - \$70	24
HCV	\$71 - \$90	37
HCV	\$91 - \$110	23
HCV	\$111 - \$130	19

Approximately \$16,300 of additional tenant paid dollars will be received each month through this waiver. This amount was calculated by increasing the TTP for the 253 households to the minimum rent of \$130 and adding together the differences for each household. Given the number of in-scope households paying below \$130 TTP a separate attachment is included with this submission outlining the household level impact of this change.

### *Low Income Public Housing*

The minimum rent requirement applies to FL009000056 Dunbar Village Project (a.k.a. Sabal Palm) LIPH site only. This is a total of nine (9) households. PIC data accessed 9/25/2023 indicates that none of the households will be impacted by the minimum rent increase.

Six (6) properties are excluded as they have an elderly or disabled head of household. One (1) household is currently paying flat rent and the remaining two (2) households are paying more than \$130 as their TTP. See the attached PIC data report for more a more detailed breakdown.

FL009000022 Southridge LIPH site is excluded from this waiver as it exclusively supports elderly households. There is no impact to any household at Southridge.



*Planned household support activities to mitigate negative impact*

Given the majority of household's in our LIPH program are exempt from the increase in minimum rent, and that only approximately 9% of all utilized WPBHA voucher will be impacted, it is anticipated that adverse impacts of this change can be contained and mitigated.

All households within scope and currently paying between \$50 and \$130 will be notified of the new minimum rent by their Housing Choice Voucher specialist or Property Manager. A minimum of thirty days written notice of the increase in their minimum rent and TTP will also be provided. In addition to notices and one-on-one meetings with staff, households will be provided on information on the hardship policy.

Current practice at each new admission and recertification, is that all households undergo a briefing with a program representative at which time they are made aware of their right to request consideration under the hardship policy. When allowable under the WPBHA ACOP or Administrative Plan, staff also examine whether hardship can be applied prior to the termination of assistance.

The continuation of utility allowance payments will also ensure that households on extremely low and very low incomes remain supported during this transition. It is not expected that this waiver will impact occupancy or utilization standards. The WPBHA will continue to use tools available to it through PIC and SEMAP to ensure support continues to go to extremely low and low income households.

As households are transitioned to the new minimum rent, the WPBHA will also regularly review requests for assistance under the hardship policy and adapt processes and practices as necessary.

The WPBHA Hardship Policy will be applied across all MTW Activities.

Families are able to apply for a suspension of any WPBHA activity that may create hardship for the household. Under the WPBHA's Hardship Policy this includes when:

- The family has lost eligibility or is awaiting eligibility determination for a Federal, State or Local assistance program
- The family would be evicted if the action was applied
- The family has experienced a decrease in income because of changed circumstances including the loss of employment, a death in the household or reduction in other assistance
- Increase in expenses because of changed circumstances for medical costs, childcare, transportation, education or similar items
- Other circumstances to be determined by the WPBHA

Assisted families must submit a request for hardship exemption in writing. If the hardship exemption is being sought for an MTW activity, the WPBHA will suspend the activity for the household at the beginning of the next month after the request.

The WPBHA will make a determination on whether the financial or other hardship exists within a reasonable time after the request is received. The WPBHA will respond in writing to the family's request and include a timeframe for which the exemption will be applied. The exemption will be reviewed regularly as determined by the WPBHA.

If the WPBHA determines that the request did not meet hardship standards, the WPBHA will notify the family in writing and resume the MTW activity. Any retroactive payments, if applicable, will be sought from the household.

In accordance with existing grievance procedures, the household may request a review of the WPBHA's decision with the Program Director or Executive Director.

All requests for consideration under the hardship policy will be recorded and retained for the duration of the WPBHA's participation in the MTW program. Regular analysis of these requests will be undertaken to assess impact of MTW programs.