

# PHA Name : Akron MHA

**PHA Code :** OH007

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

**PHA Program Type:** Combined

**MTW Cohort Number:** Stepped and Tiered Rent

**MTW Supplement Submission Type:** Annual Submission

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

AMHA continues to envision an MTW Program that meaningfully increases local affordable housing choices, reduces administrative burdens and ultimately enhances the quality of housing and services, empowering all to reach their full potential. For fiscal year 2023, AMHA plans to expand on the cost effectiveness strategies proposed in its FY2022 MTW Supplement. As part of MTW Cohort 2, AMHA is participating in the Tiered Rent Demonstration, which will provide rent simplification for both staff and participants, encourage participant asset growth, and reduce administrative time by conducting triennial recertifications and decreasing interim certifications.

After positive feedback from current households and our Resident Advisory Board, AMHA has decided to expand the triennial recertification schedule to qualifying elderly and disabled households. This change will reduce staff time spent conducting annual income reviews for households who have minimal changes in their income from year to year while also encouraging self-sufficiency. These households will generally not see an increase in their total tenant portion (TTP) during the three years in between their triennial recertifications, so can use any increases in income toward asset building, credit repair, etc.

AMHA will also be implementing a standardized medical deduction. Any qualifying household claiming a deduction for unreimbursed medical expenses will now receive the standardized deduction while still maintaining the option to submit itemized expenses should their costs exceed the standardized deduction. This change reduces staff time spent calculating medical expenses when many do not impact participants' rent. It will also reduce the burden on elderly and disabled households who can now more easily access the standardized deduction.

Finally, AMHA is reducing costs and achieving greater cost effectiveness in federal expenditures by requesting that AMHA be able to conduct inspections and rent reasonableness determinations on tenant-based voucher units AMHA owns, manages, or controls. This change will eliminate administrative time spent acquiring and maintaining a contractor to conduct these tasks, accelerate the rent review/inspection process, and reduce confusion for participants.

These changes will continue to bolster AMHA's MTW goals as we implement efficiency strategies that maintain the integrity of serving low-income households, while also reducing regulatory administrative burdens.

**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>	
a. Tiered Rent (PH)	Currently Implementing
b. Tiered Rent (HCV)	Currently Implementing
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Currently Implementing
s. Elimination of Deduction(s) (HCV)	Currently Implementing
t. Standard Deductions (PH)	Plan to Implement in the Submission Year
u. Standard Deductions (HCV)	Plan to Implement in the Submission Year
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
<b>2. Payment Standards and Rent Reasonableness</b>	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing
<b>3. Reexaminations</b>	
a. Alternative Reexamination Schedule for Households (PH)	Currently Implementing
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
c. Self-Certification of Assets (PH)	Currently Implementing
d. Self-Certification of Assets (HCV)	Currently Implementing
<b>4. Landlord Leasing Incentives</b>	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Currently Implementing
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Not Currently Implemented
<b>5. Housing Quality Standards (HQS)</b>	
a. Pre-Qualifying Unit Inspections (HCV)	Currently Implementing
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Currently Implementing
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
<b>6. Short-Term Assistance</b>	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
<b>7. Term-Limited Assistance</b>	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	

Increase Elderly Age (PH & HCV)	Not Currently Implemented
<b>9. Project-Based Voucher Program Flexibilities</b>	
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
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
a.PH Waive Operating a Required FSS Program (PH)	Not Currently Implemented
a.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b.PH Alternative Structure for Establishing Program Coordinating Committee (PH)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented
c.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.PH Modify or Eliminate the Contract of Participation (PH)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>11. MTW Self-Sufficiency Program</b>	
a.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>12. Work Requirement</b>	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
<b>14. Moving on Policy</b>	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
<b>17. Local, Non-Traditional Activities</b>	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented

**C. MTW Activities Plan that Akron MHA Plans to Implement in the Submission Year or Is Currently Implementing****1.a. - Tiered Rent (PH)**

See the FY22 MTW Supplement draft for a full description of this activity. AMHA is currently awaiting HUD approval for this activity. AMHA anticipates beginning this activity in December 2022. After the one year enrollment period for the Tiered Rent Demonstration, AMHA plans to enroll all eligible new admissions into tiered rent.

Eligible households will participate in the Rent Reform Demonstration. This demonstration will divide them into two groups: standard rent calculation and tiered rent calculation. Current households chosen for the tiered rent calculation will be grouped by retrospective gross income into tiers and new admissions will be grouped by their current gross income into tiers. Within each tier, rents are fixed and are set to be affordable at the midpoint of the tier (safe harbor request previously submitted). Any income increase within a tier does not affect the household's rent/tenant contribution. Tiers are in \$2,500 increments. Households will be eligible for hardships based on decreases in income, childcare expenses totaling \$2,500 or more annually, having 6 or more dependents, change in full-time student status with earnings that would be excluded, and other circumstances as needed (e.g., death in the family, increased expenses, etc.).

The goal of this MTW activity is to simplify the rent calculation process, reduce administrative burden, and reduce cost while achieving greater cost effectiveness in federal expenditures. The tiered rent policy is part of a larger rent reform initiative, which provides rent simplification for both staff and participants, encourages participant asset growth, and reduces administrative time by conducting triennial recertifications and decreasing interim certifications. AMHA staff will reduce their time spent on the certification processes through triennial recertifications, eliminating and/or standardizing deductions, determining rent using income tiers, and utilizing local methods for verification processes.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness; Self-sufficiency

**This MTW activity has the following cost implications:**

Decreased expenditures

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

The MTW activity applies only to a subset or subsets of assisted households

**This MTW activity applies to:**

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

**This MTW activity applies to the following Public Housing developments:**

OH007000003 Mohawk

OH007000008 Scattered Sites

OH007000014 Joy Park

OH007000015 Van Buren

OH007000024 Bon Sue

OH007000025 Valley View

OH007000029 Honey Locust Garden

OH007000030 Colonial Hills

OH007000034 Pinewood Gardens

OH007000039 Willow Run

OH007000040 Crimson Terrace

OH007000041 Maplewood Gardens

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

n/a, this activity is still under review by HUD

**This MTW activity requires a Safe Harbor Waiver.**

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

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

**In the prior year, under this activity, Akron MHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

Each income band covers \$2,500. Within each tier, the rent is set to be affordable at the midpoint of the tier (safe harbor request submitted with Supplement submitted in April 2022). Households in the lowest tier (with gross income less than or equal to \$2,499) will pay a minimum rent of \$50. For all other tiers, the rent is equal to the midpoint of the tier divided by 12 times 28%. All households in a tier will have the same rent rather than calculating rent based on adjusted or gross income. HCV households will not pay higher than their gross rent (unit rent plus utilities) and LIPH households will not pay higher than their unit's flat rent plus utilities.

**Please see attached tiered rent policy table that shows the income bands.**

**The rent will be based on tiers of household income. Please see attached for the table on the tiered rent policy table that shows the income bands.**

This activity uses a different definition of income because we are using the following MTW waivers (check all that apply)

**This activity uses different definition of income because we are using the following MTW waivers:**

1.r. and/or 1.s. "elimination of deductions"

**1.b. - Tiered Rent (HCV)**

See the FY22 MTW Supplement draft for a full description of this activity. AMHA is currently awaiting HUD approval for this

activity. AMHA anticipates beginning this activity in December 2022. After the one year enrollment period for the Tiered Rent Demonstration, AMHA plans to enroll all eligible new admissions into tiered rent.

Eligible households will participate in the Rent Reform Demonstration. This demonstration will divide them into two groups: standard rent calculation and tiered rent calculation. Current households chosen for the tiered rent calculation will be grouped by retrospective gross income into tiers and new admissions will be grouped by their current gross income into tiers. Within each tier, rents are fixed and are set to be affordable at the midpoint of the tier (safe harbor request previously submitted). Any income increase within a tier does not affect the household's rent/tenant contribution. Tiers are in \$2,500 increments. Households will be eligible for hardships based on decreases in income, childcare expenses totaling \$2,500 or more annually, having 6 or more dependents, change in full-time student status with earnings that would be excluded, and other circumstances as needed (e.g., death in the family, increased expenses, etc.).

The goal of this MTW activity is to simplify the rent calculation process, reduce administrative burden, and reduce cost while achieving greater cost effectiveness in federal expenditures. The tiered rent policy is part of a larger rent reform initiative, which provides rent simplification for both staff and participants, encourages participant asset growth, and reduces administrative time by conducting triennial recertifications and decreasing interim certifications. AMHA staff will reduce their time spent on the certification processes through triennial recertifications, eliminating and/or standardizing deductions, determining rent using income tiers, and utilizing local methods for verification processes.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness; Self-sufficiency

**This MTW activity has the following cost implications:**

Decreased expenditures

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

The MTW activity applies only to a subset or subsets of assisted households

**This MTW activity applies to:**

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

**This MTW activity applies to the following housing choice voucher unit types:** This waiver applies to all tenant based and project based units.

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

n/a, this waiver is still under review by HUD

**This MTW activity requires a Safe Harbor Waiver.**

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

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

**In the prior year, under this activity, Akron MHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

Each income band covers \$2,500. Within each tier, the rent is set to be affordable at the midpoint of the tier (safe harbor request submitted with the Supplement submitted in April 2022). Households in the lowest tier (with gross income less than or equal to \$2,499) will pay a minimum rent of \$50. For all other tiers, the rent is equal to the midpoint of the tier divided by 12 times 28%. All households in a tier will have the same rent rather than calculating rent based on adjusted or gross income. HCV households renting a unit with gross rent above the payment standard will be an exception. These households are responsible for the rent above the payment standard. HCV households will not pay higher than their gross rent (unit rent plus utilities) and LIPH households will not pay higher than their unit's flat rent plus utilities.

**Please see attached tiered rent policy table that shows the income bands.**

**The rent will be based on tiers of household income. Please see attached for the table on the tiered rent policy table that shows the income bands.**

This activity uses a different definition of income because we are using the following MTW waivers (check all that apply)

**This activity uses different definition of income because we are using the following MTW waivers:**

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

See the FY22 MTW Supplement draft for a full description of this activity. This activity has been approved by HUD. However, this waiver is a part of a larger initiative, the Tiered Rent Demonstration. This activity will not be implemented until the start of the Demonstration, which is expected to be in December 2022. After the one year enrollment period for the Tiered Rent Demonstration, AMHA plans to enroll all eligible new admissions into tiered rent, which includes the elimination of deductions.

As part of AMHA's tiered rent policy, households participating in this policy will not receive any deductions (e.g., unreimbursed child care expenses or dependent deductions) from their income. Elderly and disabled households are excluded from the tiered rent policy. In the Tiered Rent Demonstration, rent is calculated at 28% of gross income to lessen the impact on households. Households may also apply for a hardship, if applicable, to lessen the effect of the elimination of deductions. An impact analysis on this waiver was included with the Supplement submitted in April 2022. AMHA's goal for this activity, and for our rent reform policies in general, is to simplify the rent calculation process, reduce administrative burden, reduce cost and achieve greater cost effectiveness in federal expenditures. As part of AMHA's larger rent reform initiative, this activity will contribute to a reduction in AMHA staff time spent on the certification process through triennial recertifications, eliminating and/or standardizing deductions, determining rent using income tiers, and utilizing local methods for verification processes.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness

**This MTW activity has the following cost implications:**

Increased revenue; Decreased expenditures

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

The MTW activity applies only to a subset or subsets of assisted households

**This MTW activity applies to:**

New admissions and currently assisted households

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

The MTW activity applies only to selected family types



**This MTW activity applies to the following Public Housing developments:**

OH007000003 Mohawk

OH007000008 Scattered Sites

OH007000014 Joy Park

OH007000015 Van Buren

OH007000024 Bon Sue

OH007000025 Valley View

OH007000029 Honey Locust Garden

OH007000030 Colonial Hills

OH007000034 Pinewood Gardens

OH007000039 Willow Run

OH007000040 Crimson Terrace

OH007000041 Maplewood Gardens

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

n/a, waiting for Tiered Rent Demonstration for implementation.

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

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

**In the prior year, under this activity, Akron MHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

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

**Following deduction(s) will be eliminated, modified, or added.**

Dependent allowance;Unreimbursed childcare costs;Other

Other: Earned Income Disallowance

**1.s. - Elimination of Deduction(s) (HCV)**

See the FY22 MTW Supplement draft for a full description of this activity. This activity has been approved by HUD. However, this waiver is a part of a larger initiative, the Tiered Rent Demonstration. This activity will not be implemented until the start of the Demonstration, which is expected to be December 2022. After the one year enrollment period for the Tiered Rent Demonstration, AMHA plans to enroll all eligible new admissions into tiered rent, which includes the elimination of deductions.

As part of AMHA's tiered rent policy, households participating in this policy will not receive any deductions (e.g., unreimbursed child care expenses or dependent deductions) from their income. Elderly and disabled households are excluded from the tiered rent policy. In the Tiered Rent Demonstration, rent is calculated at 28% of gross income to lessen the impact on households. Households may also apply for a hardship, if applicable, to lessen the effect of the elimination of deductions. An impact analysis on this waiver was included with the Supplement submitted in April 2022. AMHA's goal for this activity, and for our rent reform policies in general, is to simplify the rent calculation process, reduce administrative burden, reduce cost and achieve greater cost effectiveness in federal expenditures. As part of AMHA's larger rent reform initiative, this activity will contribute to a reduction in AMHA staff time spent on the certification process through triennial recertifications, eliminating and/or standardizing deductions, determining rent using income tiers, and utilizing local methods for verification processes.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness

**This MTW activity has the following cost implications:**

Increased revenue; Decreased expenditures

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

The MTW activity applies only to a subset or subsets of assisted households

**This MTW activity applies to:**

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

**This MTW activity applies to the following housing choice voucher unit types:** This activity applies to all tenant-based and project-based units.

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

n/a, waiting for Tiered Rent Demonstration for implementation.

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

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

**In the prior year, under this activity, Akron MHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

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

**Following deduction(s) will be eliminated, modified, or added.**

Dependent allowance;Unreimbursed childcare costs;Other (please explain)

Other: Earned Income Disallowance

### **1.t. - Standard Deductions (PH)**

The standardized medical deduction will replace the existing deduction for unreimbursed medical expenses. Any qualifying household (a household where the head, co-head, or spouse is disabled or age 62 or older) that claims unreimbursed medical expenses will receive the standard deduction of \$500. If the household believes their expenses are greater than \$500, they may submit proof of expenses and receive a hardship if they qualify. The hardship will provide a deduction equal to the total annual unreimbursed medical expenses for the qualifying household (see hardship policy attached to this plan). The standardized medical deduction and any hardships will continue to be reduced by the medical/disability threshold set by HUD (3% of total annual income). An impact analysis and full hardship policy are included with this Supplement.

AMHA's goal for this activity is to simplify the rent calculation process, lessen the administrative burden for staff and participants, and achieve greater cost effectiveness in federal expenditures. As part of AMHA's larger rent reform initiative, this activity will contribute to a reduction in AMHA staff time spent on the certification process through triennial recertifications, simplifying deductions, determining rent using income tiers, and utilizing local methods for verification processes.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness

**This MTW activity has the following cost implications:**

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

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

n/a

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

<b>No hardship were requested in the most recent fiscal year.</b>
<b>In the prior year, under this activity, Akron MHA MTW agency</b> Received 0 hardship requests  Approved hardship requests  Denied hardship requests  There is\are hardship requests pending.
<b>This MTW activity requires an Impact Analysis. The Impact Analysis is attached.</b>
<b>500 will be the single standard deduction in the Fiscal Year</b>

<b>1.u. - Standard Deductions (HCV)</b>
The standardized medical deduction will replace the existing deduction for unreimbursed medical expenses. Any qualifying household (a household where the head, co-head, or spouse is disabled or age 62 or older) that claims unreimbursed medical expenses will receive the standard deduction of \$500. If the household believes their expenses are greater than \$500, they may submit proof of expenses and receive a hardship if they qualify. The hardship will provide a deduction equal to the total annual unreimbursed medical expenses for the qualifying household (see hardship policy attached to this plan). The standardized medical deduction and any hardships will continue to be reduced by the medical/disability threshold set by HUD (3% of total annual income). An impact analysis and full hardship policy are included with this Supplement.  AMHA's goal for this activity is to simplify the rent calculation process, lessen the administrative burden for staff and participants, and achieve greater cost effectiveness in federal expenditures. As part of AMHA's larger rent reform initiative, this activity will contribute to a reduction in AMHA staff time spent on the certification process through triennial recertifications, simplifying deductions, determining rent using income tiers, and utilizing local methods for verification processes.
<b>This MTW activity serves the following statutory objectives:</b>  Cost effectiveness
<b>This MTW activity has the following cost implications:</b>  Decreased expenditures
<b>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.</b>  The MTW activity applies only to a subset or subsets of assisted households
<b>This MTW activity applies to:</b>  New admissions and currently assisted households
<b>An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).</b>  The MTW activity applies only to selected family types
<b>This MTW activity applies to the following housing choice voucher unit types:</b> This activity applies to all tenant-based units and properties with project-based vouchers.
<b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b>

n/a

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

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

**In the prior year, under this activity, Akron MHA 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.**

**500 will be the single standard deduction in the Fiscal Year**

**2.d. - Rent Reasonableness – Third-Party Requirement (HCV)**

See the FY22 MTW Supplement draft for a full description of this activity. This activity has been approved by HUD and is currently being implemented by AMHA.

AMHA will no longer require a third party to conduct rent reasonableness tests at PBV properties that AMHA owns, manages, or controls. AMHA will follow the rent reasonableness process used for all other properties and conduct the test using Market Vision Partners' Rentellect online system. These tests will be subject to AMHA's voucher program quality control processes. At the Department's request, AMHA must obtain the services of a third-party entity to determine rent reasonableness for PHA-owned units. Requiring approval from a 3rd party may increase costs and creates potential delays in the availability of needed housing units, while adding no measurable value to the process. Conducting these rent reasonableness tests in house will achieve greater cost-effectiveness in federal expenditures, improve administrative efficiencies, eliminate confusion for participants, and improve the response time for conducting rent reasonableness analyses. This waiver contributes to AMHA's larger initiative of promoting project-based voucher efficiency by no longer requiring third parties to conduct rent reasonableness tests and inspections for PBV properties that AMHA has an interest in.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness

**This MTW activity has the following cost implications:**

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

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

AMHA received approval for this waiver on 6/29/22 and is currently in the process of implementing it. At this time, there are no accomplishments or changes to report.

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

**In the prior year, under this activity, Akron MHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**Following will explain quality assurance method:**

The Contract and Leasing Supervisor audits each rent reasonableness test for accuracy in address, requested rent, utilities, and effective date. The Supervisor and HCVP Manager review the Market Vision Partners online system for accuracy as needed. This quality assurance method is available to anyone who would request it. **and attached for quality assurance method**

**Following will explain rent reasonableness determination method:**

See the FY22 MTW Supplement draft for a full description of this activity's rent reasonableness determination method.

Market Vision Partners (rent reasonableness online system) maintains an automated database, which includes data on unassisted units for use by staff in making rent reasonableness determinations. The data is updated on an ongoing basis and purged when it is more than 48 months old. The online system uses multiple regression statistics to determine the reasonable rent. Reasonable rents are those determined to be comparable to a fair/high unit with consideration of the following features: size (number of qualifying bedrooms), location, unit type, and utilities. Exception calculations are permitted for units constructed in 2002 or later and for multi-family buildings that provide health and safety features. **and attached for rent reasonableness determination method**

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

Proposed for FY23 (Elderly/Disabled Households):

In addition to offering triennial reexaminations to work-able households in the Tiered Rent Demonstration, AMHA will also move to a triennial reexamination schedule for some elderly and disabled households. If a household meets the following three criteria, it will be enrolled in triennial reexaminations.

- the head of household, co-head, and/or spouse is elderly or disabled,
- the only current income in the household is fixed income (e.g., social security, pension), and
- there are no minors in the household.

If a household is enrolled in triennial reexaminations and no longer meets these criteria, they will return to annual reexaminations.

For these households, the standard rent calculation method will be used and households will continue to receive the elderly/disabled allowance and be eligible to claim unreimbursed medical expenses, if applicable (see standardized medical deduction waiver). If a household's income increases in between triennial reexaminations, the household's total tenant payment (TTP) will not increase. The households may continue to request interim reexaminations due to a decrease in income. There will be no limit to the number of interim reexaminations allowed to be requested. If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship. An impact analysis and full hardship policy are included with this Supplement.

Triennial reexaminations for these households are expected to begin with reexaminations effective in 2024 after the completion of the Tiered Rent Demonstration enrollment period (expected to end 12/31/23). When triennial reexaminations begin for these current households, all newly admitted households who meet the above criteria will also be enrolled in triennial reexaminations.

As with the Tiered Rent Demonstration triennial reexaminations, this schedule will also include only reviewing the EIV at the triennial recertification rather than annually and implementing a release form that is valid for 40 months. In addition, households on a triennial recertification schedule will not utilize the IVT Report as this reporting requirement is not consistent with the triennial reporting of income and will create an administrative burden that does not assist in the establishment of the level of subsidy the family receives and will increase administrative burden of PHA staff. Unreported income requires no change or rent correction for triennial households unless it occurs before their last reexamination, so the IVT Report will not provide any needed information that cannot be gathered from the EIV. PHA staff will continue to monitor the EIV at households' triennial reexaminations to ensure the proper reporting of income.

AMHA's goals for utilizing triennial recertifications are to reduce cost and achieve greater cost effectiveness in federal

expenditures while also encouraging participant self-sufficiency. Expanding to elderly and disabled households will build upon the efficiencies gained through triennial recertifications for the Tiered Rent Demonstration. As part of AMHA's larger rent reform initiative, this activity will contribute to a reduction in AMHA staff time spent on the certification process for participants through triennial recertifications, standardizing medical deductions, and utilizing local methods for verification processes.

Previous waiver request for FY22 (Tiered Rent Demonstration):

See the FY22 MTW Supplement draft for a full description of this activity. AMHA is currently awaiting HUD approval for this activity. AMHA anticipates beginning this activity in December 2022. After the one year enrollment period for the Tiered Rent Demonstration, AMHA plans to enroll all eligible new admissions into tiered rent and triennial recertifications.

For the tiered rent group in the Tiered Rent Demonstration, each household's tiered rent will apply for three years. During that three-year period, their TTP will not increase and the household will keep any increases in income, rather than having to put it toward rent. After three years, each household will have a triennial income reexamination and be placed in the tier that matches their total annual gross income in the prior 12 months. Between triennial reexaminations, there will be no interim reexaminations, but rather hardship rents. A household's tiered rent will temporarily change if it is approved for a hardship rent. . An impact analysis was submitted with the Supplement submitted in April 2022.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Self-sufficiency

**This MTW activity has the following cost implications:**

Decreased revenue;Decreased expenditures

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

The MTW activity applies only to a subset or subsets of assisted households

**This MTW activity applies to:**

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

**This MTW activity applies to the following Public Housing developments:**

FY23 Proposed (Elderly/Disabled Households):

Applies to all developments.

Previously submitted FY22 Proposed (Tiered Rent Demonstration):

OH007000003 Mohawk

OH007000008 Scattered Sites

OH007000014 Joy Park

OH007000015 Van Buren

OH007000024 Bon Sue

OH007000025 Valley View

OH007000029 Honey Locust Garden

OH007000030 Colonial Hills

OH007000034 Pinewood Gardens

OH007000039 Willow Run

OH007000040 Crimson Terrace

OH007000041 Maplewood Gardens

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

n/a for FY23 (Elderly/Disabled)

n/a for FY22 (Tiered Rent Demonstration), awaiting HUD approval for this activity

**This MTW activity requires a Safe Harbor Waiver.**

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

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

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

**In the prior year, under this activity, Akron MHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

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

**Recertification Schedule is**

Once every three years

**Household may request 2 or more interim recertifications per year.**

Proposed for FY 2023 for Qualifying Elderly/Disabled Households:

If a household's income increases in between triennial reexaminations, the household's total tenant payment (TTP) will not increase. The households may continue to request interim reexaminations due to a decrease in income. There will be no limit to the number of interim reexaminations allowed to be requested. If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship. An impact analysis and full hardship



policy are included with this Supplement.

FY22 Proposed (Tiered Rent Demonstration):

The previous request for triennial reexaminations as part of the Tiered Rent Demonstration does not allow for any interim recertifications, but households may request temporary hardships lasting 6-12 months. This request is currently under review by HUD. See the FY22 MTW Supplement draft submitted in April 2022 for a full description of this hardship policy.

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

Proposed for FY 2023 (Elderly/Disabled Households):

In addition to offering triennial reexaminations to work-able households in the Tiered Rent Demonstration, AMHA will also move to a triennial reexamination schedule for some elderly and disabled households. If a household meets the following three criteria, it will be enrolled in triennial reexaminations.

- the head of household, co-head, and/or spouse is elderly or disabled,
- the only current income in the household is fixed income (e.g., social security, pension), and
- there are no minors in the household.

If a household is enrolled in triennial reexaminations and no longer meets these criteria, they will return to annual reexaminations.

For these households, the standard rent calculation method will be used and households will continue to receive the elderly/disabled allowance and be eligible to claim unreimbursed medical expenses, if applicable (see standardized medical deduction waiver). If a household's income increases in between triennial reexaminations, the household's total tenant payment (TTP) will not increase. While TTP will not increase, the household's rent may increase if their unit's contract rent is above their payment standard. The households may continue to request interim reexaminations due to a decrease in income. There will be no limit to the number of interim reexaminations allowed to be requested. If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship. An impact analysis and full hardship policy are included with this Supplement.

Triennial reexaminations for these households are expected to begin with reexaminations effective in 2024 after the completion of the Tiered Rent Demonstration enrollment period (expected to end 12/31/23). When triennial reexaminations begin for these current households, all newly admitted households who meet the above criteria will also be enrolled in triennial reexaminations.

As with the Tiered Rent Demonstration triennial reexaminations, this schedule will also include only reviewing the EIV at the triennial recertification rather than annually, implementing a release form that is valid for 40 months, and updating the payment standard and utility allowance at the time of a rent increase for the affected households. In addition, households on a triennial recertification schedule will not utilize the IVT Report as this reporting requirement is not consistent with the triennial reporting of income and will create an administrative burden that does not assist in the establishment of the level of subsidy the family receives and will increase administrative burden of PHA staff. Unreported income requires no change or rent correction for triennial households unless it occurs before their last reexamination, so the IVT Report will not provide any needed information that cannot be gathered from the EIV. PHA staff will continue to monitor the EIV at households' triennial reexaminations to ensure the proper reporting of income.

AMHA's goals for utilizing triennial recertifications are to reduce cost and achieve greater cost effectiveness in federal expenditures while also encouraging participant self-sufficiency. Expanding to elderly and disabled households will build upon the efficiencies gained through triennial recertifications for the Tiered Rent Demonstration. As part of AMHA's larger rent reform initiative, this activity will contribute to a reduction in AMHA staff time spent on the certification process for participants through triennial recertifications, standardizing medical deductions, and utilizing local methods for verification processes.

Previous waiver request for FY22 (Tiered Rent Demonstration):

See the FY22 MTW Supplement draft for a full description of this activity. AMHA is currently awaiting HUD approval for this activity. AMHA anticipates beginning this activity in December 2022. After the one year enrollment period for the Tiered Rent Demonstration, AMHA plans to enroll all eligible new admissions into tiered rent and triennial recertifications.

For the tiered rent group in the Tiered Rent Demonstration, each household's tiered rent will apply for three years. During

that three-year period, their TTP will not increase and the household will keep any increases in income, rather than having to put it toward rent. After three years, each household will have a triennial income reexamination and be placed in the tier that matches their total annual gross income in the prior 12 months. Between triennial reexaminations, there will be no interim reexaminations, but rather hardship rents. A household's tiered rent will temporarily change if it is approved for a hardship rent. . An impact analysis was submitted with the Supplement submitted in April 2022.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Self-sufficiency

**This MTW activity has the following cost implications:**

Increased expenditures;Decreased expenditures

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

The MTW activity applies only to a subset or subsets of assisted households

**This MTW activity applies to:**

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

**This MTW activity applies to the following housing choice voucher unit types:** This activity applies to all tenant-based units and properties with project-based vouchers.

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

n/a for FY23 Proposed (Elderly/Disabled Households)

n/a for FY22 Proposed (Tiered Rent Demonstration), awaiting approval from HUD

**This MTW activity requires a Safe Harbor Waiver.**

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

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

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

**In the prior year, under this activity, Akron MHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

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

**Recertification Schedule is**

Once every three years

**Household may request 2 or more interim recertifications per year.**

Proposed for FY 2023 for Qualifying Elderly/Disabled Households:

If a household's income increases in between triennial reexaminations, the household's total tenant payment (TTP) will not increase. While TTP will not increase, the household's rent may increase if their unit's contract rent is above their payment standard. The households may continue to request interim reexaminations due to a decrease in income. There will be no limit to the number of interim reexaminations allowed to be requested. If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship. An impact analysis and full hardship policy are included with this Supplement.

FY22 Proposed (Tiered Rent Demonstration):

The previous request for triennial reexaminations as part of the Tiered Rent Demonstration does not allow for any interim recertifications, but households may request temporary hardships lasting 6-12 months. This request is currently under review by HUD. See the FY22 MTW Supplement draft submitted in April 2022 for a full description of this hardship policy.

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

See the FY22 MTW Supplement draft for a full description of this activity. This activity has been partially approved by HUD and is currently being implemented by AMHA. HUD approved the self-certification of assets up to \$50,000 for current households and is still reviewing the request to allow applicants the same self-certification.

This waiver will improve cost effectiveness in our effort to reduce administrative burden while still maintaining the integrity of the rent calculation process. This waiver contributes to our larger rent reform initiative, which seeks to achieve greater efficiency and remove administrative barriers.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness

**This MTW activity has the following cost implications:**

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

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about**

**what has been accomplished or changed during the implementation.**

AMHA implemented the self-certification of assets up to \$50,000 for current households as of 7/1/22. Prior to the waiver approval, AMHA was allowing self-certification of assets up to \$5,000 for two out of every three years. 2022 was a self-certification year, so there has been minimal impact on staff time this year in raising the threshold for self-certification. AMHA expects significant savings in allowing self-certification during the third year in the cycle when all assets would normally have been verified. No changes have been made during implementation.

**This MTW activity requires a Safe Harbor Waiver.**

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

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

**In the prior year, under this activity, Akron MHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**The dollar threshold for the self-certification of assets is**

\$50,000.

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

See the FY22 MTW Supplement draft submitted in April 2022 for a full description of this activity. This activity has been partially approved by HUD and is currently being implemented by AMHA. HUD approved the self-certification of assets up to \$50,000 for current households and is still reviewing the request to allow applicants the same self-certification.

This waiver will improve cost effectiveness in our effort to reduce administrative burden while still maintaining the integrity of the rent calculation process. This waiver contributes to our larger rent reform initiative, which seeks to achieve greater efficiency and remove administrative barriers.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness

**This MTW activity has the following cost implications:**

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

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

o AMHA implemented the self-certification of assets up to \$50,000 for current households as of 7/1/22. Prior to the waiver approval, AMHA was allowing self-certification of assets up to \$5,000 for two out of every three years. 2022 was a self-certification year, so there has been minimal impact on staff time this year in raising the threshold for self-certification. AMHA expects significant savings in allowing self-certification during the third year in the cycle when all assets would normally have been verified. No changes have been made during implementation.

**This MTW activity requires a Safe Harbor Waiver.**

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

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

**In the prior year, under this activity, Akron MHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**The dollar threshold for the self-certification of assets is**

\$50,000.

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

See the FY22 MTW Supplement draft for a full description of this activity. This activity has been approved by HUD and is currently under implementation by AMHA.

AMHA will offer vacancy loss payments to landlords in AMHA determined zip codes of opportunity that re-lease a unit to a voucher holder after a previous voucher holder has vacated the unit. The payment amount will be no more than one month's contract rent of the previous tenant. The landlord must re-lease the unit to a new voucher holder within 3 months of the AMHA recorded move-out date of the previous tenant and will be paid when the new HAP contract is executed between the owner and AMHA. The goal of this activity is to incentivize landlords to continue their participation in the HCVP program and to maintain the availability of units in zip codes of opportunity. The vacancy loss payments are part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity.

**This MTW activity serves the following statutory objectives:**

Housing choice

**This MTW activity has the following cost implications:**

Increased expenditures

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

The MTW activity applies only to a subset or subsets of assisted households

**This MTW activity applies to:**

New admissions and currently assisted households

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

The MTW activity applies to all family types

**This MTW activity applies to the following housing choice voucher unit types:** This activity will apply to units in zip codes of opportunity. In these zip codes, AMHA currently offers an increased payment standard due to higher cost rental units, fewer voucher holders living in these areas, and opportunities available to residents in the area. PHA staff review these areas annually.

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

n/a, AMHA is currently working on implementation. No changes have been made at this time.

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

**In the prior year, under this activity, Akron MHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**This policy applies to**

Certain types of units only

**The types of units policy applies to:**

Units in particular types of areas or neighborhoods

This activity will apply to units in zip codes of opportunity. In these zip codes, AMHA currently offers an increased payment standard due to higher cost rental units, fewer voucher holders living in these areas, and opportunities available to residents in the area. PHA staff review these areas annually.

**Maximum payment to the landlord is**

\$The payment will be no more than one month of contract rent of the previous tenant..

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

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

### **5.a. - Pre-Qualifying Unit Inspections (HCV)**

See the FY22 MTW Supplement draft for a full description of this activity. This activity has been approved by HUD and is currently under implementation by AMHA.

AMHA will offer pre-qualifying inspections for units in AMHA determined zip codes of opportunity. To be used in lieu of a move-in inspection, the pre-inspection must have passed within 90 days of the AMHA approved move in date. Participants will be able to request an interim inspection after move in as needed. The goal of these inspections is to lessen the time it takes for a voucher holder to move into a unit and encourage participation from new landlords in zip codes of opportunity by offering additional customer service. The pre-qualifying unit inspections are part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity.

**This MTW activity serves the following statutory objectives:**

Housing choice

**This MTW activity has the following cost implications:**

Neutral (no cost implications)

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

The MTW activity applies only to a subset or subsets of assisted households

**This MTW activity applies to:**

New admissions and currently assisted households

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

The MTW activity applies to all family types

**This MTW activity applies to the following housing choice voucher unit types:** This activity will apply to units in zip codes of opportunity. In these zip codes, AMHA currently offers an increased payment standard due to higher cost rental units, fewer voucher holders living in these areas, and opportunities available to residents in the area. PHA staff review these areas annually.

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

n/a, AMHA is currently working on implementation and is in the process of hiring a staff person to begin conducting pre-qualifying unit inspections.

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

**In the prior year, under this activity, Akron MHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**The pre-inspection is valid for**

**90 days.**

### **5.c. - Third-Party Requirement (HCV)**

See the FY22 MTW Supplement draft for a full description of this activity. This activity has been approved by HUD and is currently being implemented by AMHA.

AMHA will no longer require a third party to conduct inspections at PBV properties that AMHA has an interest in. AMHA will follow the inspection process utilizing the current HUD inspection method that is used for all other HCV properties. The inspections will be subject to AMHA's voucher program quality control processes. Participants will also be able to request an interim inspection at any time if they feel an inspection need was not met. Conducting these inspections in house will achieve greater cost-effectiveness in federal expenditures, improve administrative efficiencies, eliminate confusion for participants, and improve the response time for conducting inspections. This waiver contributes to our larger initiative of promoting project-based voucher efficiency by no longer requiring third parties to conduct rent reasonableness tests and inspections for PBV properties that AMHA has an interest in.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness

**This MTW activity has the following cost implications:**

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

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

AMHA has begun conducting inspections on PBV properties in which AMHA has an interest. AMHA is currently in the process of hiring additional staff to conduct these inspections. Thus far, we have been able to more quickly meet the inspection needs of the PBV properties than if we had to wait to schedule with a 3rd party contractor.

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

**In the prior year, under this activity, Akron MHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**The quality assurance method:**

**Following will explain the quality assurance method** – The Quality Control Inspector selects recently completed inspections drawn from the three months preceding the re-inspection that represent a cross section of neighborhoods and the work of a cross section of inspectors. The number of inspections expected to have a quality control re-inspection is calculated as follows: if number of units is over 2,000, the number of files to be selected is 30 plus one for each 200 (or part of 200) over 2,000.

If [Upload file] options- Display 'Attached for quality assurance method'



<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<b>Safe Harbor Waivers seeking HUD Approval:</b> No Safe Harbor Waivers are being requested.

<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, Agency-Specific Waivers may be requested.</p> <p>Please see attached for Agency-Specific Waiver(s) requested this year.</p>
<b>E.2</b>	<p><b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</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>	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.

<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>
2021	\$21,341,280	\$21,341,280	\$0	2029-09-30
2022	\$21,661,780	\$21,661,780	\$0	2030-09-30
	\$0	\$0	\$0	

<b>G.</b>	<b>MTW Statutory Requirements.</b>	
<b>G.1</b>	<b>75% Very Low Income – Local, Non-Traditional.</b> 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.	
	<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>
MTW agency established a rent reform policy to encourage employment and self-sufficiency	

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

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

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

Family Size:	Occupied Number of Local, Non-Traditional units by 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.
	Please see attached for an additional public hearing held for Agency-Specific Waiver(s) and/or Safe Harbor Waiver(s)

I.	Evaluations.
	Yes - This table lists evaluations of Akron MHA's MTW activities, including the names of evaluators and available reports

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

Title and short description	Evaluator name and contact information	Time period	Reports available
Stepped and Tiered Rent Demonstration. AMHA's participation in the second cohort of the MTW Expansion will evaluate alternative rent policies designed to increase resident self-sufficiency and reduce PHA administrative burdens. An independent research team lead by MDRC will work with HUD and the selected PHAs to assist in implementation and evaluate the effects of the alternative rent policies.	James Riccio, MDRC James.Riccio@mdrc.org	01/01/2023-12/31/2029	

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (01/01/2023), 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 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.

Akron Metropolitan Housing Authority

OH007

**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).*

Marco Sommerville

Board Chair

**NAME OF AUTHORIZED OFFICIAL**

**TITLE**



10-3-2022

**SIGNATURE**

**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.*

**Akron Metropolitan Housing Authority**  
**Agency Specific Waiver – Authorized to Perform Rent Reasonableness Determinations on Tenant-Based Voucher Units AMHA Owns, Manages, or Controls**

<p><b>Describe the MTW activity (including what specifically the agency is proposing to waive), 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>AMHA is proposing to waive 24 CFR 982.352(b)(1)(iv)(A)(1) to authorize AMHA to perform rent reasonableness determinations on units in which AMHA has an interest in the property and a voucher holder is residing or wishes to reside in the unit. This waiver will impact all household types in the HCV program. AMHA will follow the rent reasonableness process used for all other properties and conduct the test using Market Vision Partners’ Rentellect online system. Market Vision Partners maintains an automated database, which includes data on unassisted units for use by staff in making rent reasonableness determinations. The data is updated on an ongoing basis and purged when it is more than 48 months old. The online system uses multiple regression statistics to determine the reasonable rent. A rent comparison is not required for dwelling units receiving low income housing tax credits (LIHTC) if the rent does not exceed the rent for other LIHTC or HOME assisted units in the project that are occupied by families with tenant based assistance. The rent for these units will be considered reasonable if it does not exceed the payment standard established by the PHA.</p> <p>The rent reasonableness tests will be subject to AMHA’s voucher program quality control processes. The Contract and Leasing Supervisor audits each rent reasonableness test for accuracy in address, requested rent, utilities, and effective date. The Supervisor and HCVP Manager review the Market Vision Partners online system for accuracy as needed. This quality assurance method is available to anyone who would request it. Additionally, at HUD’s request, AMHA must obtain the services of a third-party entity to determine rent reasonableness for PHA-owned units.</p> <p>Conducting these rent reasonableness tests in house will achieve greater cost-effectiveness in federal expenditures, improve administrative efficiencies, eliminate confusion for participants/landlords, and improve the response time for conducting rent reasonableness analyses. Requiring approval from a 3<sup>rd</sup> party increases costs and creates potential delays in the availability of needed housing units, while adding no measurable value to the process. This waiver contributes to our larger efficiency initiatives by no longer requiring third parties to conduct rent reasonableness tests and inspections for project-based voucher and tenant-based voucher properties that AMHA has an interest in.</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>Decrease expenditures or cost neutral.</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>This waiver applies to all 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>This waiver applies to both new admissions and currently assisted households.</p>

<b>Does the MTW activity apply to all family types or only to selected family types?</b>
This waiver applies to all family types.
<b>Please select the family types subject to this MTW activity.</b>
All family types.
<b>If Other Selected in Previous Question: Please describe this target population.</b>
n/a
<b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b>
This waiver applies to HCV tenant-based units that AMHA owns, manages, or controls.
<b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b>
This waiver applies to HCV tenant-based units that AMHA owns, manages, or controls.
<b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b>
n/a
<b>Implementation timeline.</b>
AMHA plans to implement this initiative beginning in January 2023.
<b>Impact analysis.</b>
See separate attachment – OH007FY23TBVReasoners&InspectImpact.
<b>Description of a hardship policy, if needed.</b>
This is an administrative efficiency that should not require assisted families to request a hardship exemption. However, families and landlords may request a review and explanation of the unit's rent reasonableness determination.

**OH007 FY2023 Agency Specific Waiver Public Comments – Authorized to Perform Rent Reasonableness Determinations on Tenant-Based Voucher Units AMHA Owns, Manages, or Controls**

**9-9-22 Virtual MTW Safe Harbor & Agency Specific Meeting (morning)**

- Held virtually through zoom
- 4 AMHA staff
- 1 LIPH participant
- No comments received on this Agency Specific Waiver

**9-9-22 In Person MTW Safe Harbor & Agency Specific Meeting (afternoon)**

- 5 AMHA staff

- 2 LIPH participants
- 3 HCVP landlords
- No comments received on this Agency Specific Waiver



**Akron Metropolitan Housing Authority  
MTW Alternative Reexamination Schedule (Triennial) for Households  
(Qualifying Elderly and Disabled Households) Impact Analysis**

<b>MTW Activities Covered by Impact Analysis</b>
3.a., 3.b. Alternative Reexamination Schedule for Households (Qualifying Elderly and Disabled Households)
<b>1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)</b>
AMHA estimates an administrative savings of roughly \$210,000 over the course of three years due to triennial reexaminations (\$70,000 per year). Due to anticipated COLA increases during the three year cycle and no corresponding increase in total tenant portion (TTP)/rent, AMHA estimates an HCV HAP cost of approximately \$249,000 and a decrease in incoming LIPH rents of approximately \$275,000.  It is also possible that households on the triennial recertification cycle will increase their income beyond COLA increases between triennial reexaminations, resulting in higher per family contributions by AMHA than would have been spent under the current rent policy due to not capturing savings from income increases. AMHA will continue to examine the effects of triennial recertifications for qualifying elderly/disabled households as well as through the Tiered Rent Demonstration in which AMHA is participating.
<b>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)</b>
Affected households will generally see a decrease in their portion of income that must go towards paying rent over the three year cycle. Households will not see an increase in their rent during the three-year recertification cycle even if they have an increase in income. In addition, if their household experiences a decrease in income, they may apply for a decrease in their total tenant payment (TTP)/rent. As noted above, the estimated change in TTP/rent paid by households over three years in the HCV program is \$249,000 and in LIPH it is \$275,000.
<b>3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)</b>
No expected impact.
<b>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)</b>
Minimal to no expected impact. Households on a triennial reexamination cycle may receive fewer termination notices for noncompliance with required appointments and/or documentation.
<b>5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program</b>
No expected impact.
<b>6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice</b>
This activity promotes the MTW statutory goals of cost effectiveness and self-sufficiency. Moving to triennial reexaminations, combined with other streamlining waivers AMHA is requesting, is expected to reduce staff time associated with annual reexaminations. Triennial reexaminations will also contribute to the MTW goal of self-sufficiency. These households will generally not see an increase in their total tenant portion (TTP) during the three years in between their triennial recertifications, so can use any increases in income toward asset building, credit repair, etc.
<b>7. Impact on the agency's ability to meet the MTW statutory requirements</b>

Triennial reexaminations for qualifying elderly and disabled households will support AMHA's effort to establish a reasonable rent policy that encourages employment and self-sufficiency.

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

AMHA expects hardships to be minimal. Qualifying elderly and disabled households that are on a triennial reexamination cycle will continue to have the option of an interim reexamination for decreases in income and will only need to request a hardship for other financial hardships. AMHA intends to track hardship requests to determine the impact of the policy on participating households and the amount of staff time spent processing hardship requests.

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

No expected impact.

## **AMHA HARDSHIP POLICY**

If a requirement or provision of an MTW activity may constitute a financial or other hardship for AMHA households, AMHA will create a hardship policy. AMHA will review its hardship policy(s) with households during its intake and recertification processes. The agency will also consider if a household qualifies for a hardship exemption at the time of a potential termination of assistance that is due to an MTW activity. When a household requests a hardship exemption from a required MTW activity, AMHA will suspend the activity for the household, beginning the next month after the request, until the MTW agency has determined if the request is warranted. Hardship information will be retained by AMHA for the duration of AMHA's participation in the MTW demonstration program and available for public review and inspection.

If a household disagrees with their hardship determination, they may use the following grievance procedure:

Request a review, which will be conducted by a staff member at the supervisor level or higher.  
The household must request a grievance review within and including ten (10) business days of the decision to deny or limit their tiered rent hardship request.

### **Hardship Policy: Elderly/Disabled Households Triennial Recertifications**

Households experiencing a decrease in income may request an interim reexamination. If a household believes they have another circumstance that qualifies as a financial hardship, the household must complete the Hardship Request form and attach proof of the hardship. The request will be reviewed and the household notified of the approval or denial in a timely manner. The hardship request will be denied if the form is not accompanied by documentation of the hardship and/or the request would not change the household's rent. In the case of hardship denials, the household will be sent a denial letter stating why they did not qualify.

## AMHA HARDSHIP POLICY

If a requirement or provision of an MTW activity may constitute a financial or other hardship for AMHA households, AMHA will create a hardship policy. AMHA will review its hardship policy(s) with households during its intake and recertification processes. The agency will also consider if a household qualifies for a hardship exemption at the time of a potential termination of assistance that is due to an MTW activity. When a household requests a hardship exemption from a required MTW activity, AMHA will suspend the activity for the household, beginning the next month after the request, until the MTW agency has determined if the request is warranted. Hardship information will be retained by AMHA for the duration of AMHA's participation in the MTW demonstration program and available for public review and inspection.

If a household disagrees with their hardship determination, they may use the following grievance procedure:

Request a review, which will be conducted by a staff member at the supervisor level or higher. The household must request a grievance review within and including ten (10) business days of the decision to deny or limit their tiered rent hardship request.

### Hardship Policy: Standardized Medical Deduction

Households with unreimbursed medical expenses greater than \$500 may apply for a hardship. If approved, the hardship will provide a deduction equal to the household's total annual unreimbursed medical expenses (minus HUD's medical/disability threshold).

Hardships may be requested by the household or they may be automatic at the time of annual or triennial recertification.

To request a hardship, the household must complete the Hardship Request form and attach proof of all unreimbursed medical expenses for the prior 12 months. The form will be made available in an accessible format upon request as a reasonable accommodation. The request will be reviewed and the household notified of the approval or denial in a timely manner.

The hardship request will be denied if the form is not accompanied by documentation of the hardship and/or the request would not change the household's rent. In the case of hardship denials, the household will be sent a denial letter stating why they did not qualify.

Standardized Medical Deduction hardships will last until the household's next annual or triennial reexamination.

If a household is approved for a hardship, and subsequently incurs additional unreimbursed medical expenses while still in hardship status, they may request an additional hardship. The request will be treated as a new hardship request and undergo a new determination with proof of all applicable medical expenses. There is no limit on the number of hardships that a household may receive.

## **OH007 FY2023 MTW Supplement Public Comments**

### **6-17-22 MTW Advisory Committee Meeting**

- In person meeting at AMHA's Central Office
- 3 AMHA staff
- 6 committee members made up of community stakeholders, HCV participants, LIPH participants, and HCV landlords
- Committee member comment: Triennial recertifications for elderly/disabled households will be helpful, but there should be some contact in between the recertifications so households feel connected and have reminders that their rent will be changing at the triennial recertification.

### **8-12-22 MTW/Annual Plan Meeting with Resident Advisory Board**

- Held virtually through zoom
- 4 AMHA staff
- 5 LIPH participants
- Participant comment: Glad to see that some elderly/disabled households are going to be on a triennial recertification cycle.
- Participant comment: When elderly/disabled households are on a triennial recertification cycle, participants should still be contacted or have some interaction with staff on the "off" years so they know they can reach out if they have any issues.
- Participant comment: Standardized medical deductions sound like they will make things easier. Will holistic medicine be counted?

### **8-23-22 Stakeholder Meeting (Community Partners)**

- Held virtually through zoom
- 5 AMHA staff
- 3 community partners from Community Legal Aid, Fair Housing Contact Service
- No comments received

### **9-9-22 Virtual MTW Public Meeting (morning)**

- Held virtually through zoom
- 4 AMHA staff
- 1 LIPH participant
- Participant comment: Glad to see that some elderly/disabled households are going to be on a triennial recertification cycle.
- Participant comment: How do I go about buying a house?

### **9-9-22 In Person MTW Public Meeting (afternoon)**

- In person meeting at AMHA's Central Office

- 5 AMHA staff
- 2 LIPH participants
- 3 HCVP landlords
- Landlord comment: Are voucher holders allowed to use their vouchers on larger sized units?

#### **9-16-22 MTW Advisory Committee Meeting**

- Held virtually through zoom
- 3 AMHA staff
- 3 committee members made up of stakeholders and an HCV landlord
- Committee member comment: Is there a way to streamline the income review for voucher holders at tax credit units? Possibly use the tax credit compliance in place of AMHA's compliance?
- Committee member comment: AMHA should increase the 3 bedroom payment standard. Rent costs have increased so much that even AMHA's increased payment standards have not been enough to make some of the units affordable.

#### **Written Comments Received**

- Stakeholder written comment: The hardship request process for any and all waivers should be simple and AMHA should provide forms with simplified language and larger spaces for writing information

## **OH007 FY2023 Response to MTW Supplement Public Comments**

### **Description of how AMHA considered the public comments received:**

Commenters agreed with AMHA's efforts to lessen the burden on some elderly/disabled households by offering triennial recertifications. Several commenters noted that it would be helpful for AMHA to contact the households in between triennial recertifications. AMHA plans to develop letters including information on the triennial recertification process and financial empowerment and send them to households in between triennial recertifications.

One commenter expressed approval of AMHA's standardized medical deduction waiver, but also questioned if holistic medicine will be counted towards medical expenses. AMHA staff explained that the proposed waiver does not change what is included/excluded in medical expenses and discussed the process for how non-prescription medications could be considered expenses.

An MTW Advisory Committee member suggested that AMHA review its ability to utilize tax credit compliance and verifications in lieu of AMHA's own requirements. AMHA staff explained the cooperation currently in place between tax credit project-based voucher owners and the HCVP staff to streamline the background check and verification processes. In addition, the properties to which the commenter was referring are housing for disabled individuals, all of whom should qualify for AMHA's proposed triennial recertifications. Limiting recertifications to every three years will lessen the households' burdens and ease some of the committee member's concern over multiple program requirements.

AMHA received a written comment concerning the hardship policy for all waivers. AMHA agrees that the process and form for a hardship request should be easily accessible, understandable, and attainable for qualified households. AMHA will include this comment when creating its hardship forms.

Finally, some commenters asked questions regarding current AMHA policies that are unaffected by the MTW changes including homeownership, voucher unit size, and payment standards. AMHA relayed the current policies and gave contact information for which staff member to connect with if additional information was needed.

**Akron Metropolitan Housing Authority  
MTW Standard Deduction for Medical Expenses Impact Analysis**

<b>MTW Activities Covered by Impact Analysis</b>
1.t., 1.u. Standard Deductions – Medical Expenses
<b>1. Impact on the agency’s finances (e.g., how much will the activity cost, any change in the agency’s per family contribution)</b>
Due to standardizing medical expenses, AMHA expects to save approximately \$12,000 in administrative costs annually. The volume and amount of medical expenses varies by household and many (38.2%) households submitting expense documentation do not meet the HUD threshold (3% of gross income) to have their expenses impact their total tenant payment (TTP).  AMHA expects minimal change in the agency’s per family contribution. If additional households claim the standardized medical expense that did not previously claim it, AMHA does not expect to pay out additional subsidy based on the average threshold (\$534.22) before medical expenses will begin reducing a household’s TTP.
<b>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)</b>
AMHA does not expect this activity to have an impact on affordability for affected families. Households paying more than the standard medical deduction (\$500) may submit all of their expenses as a hardship and continue to receive credit for the full cost of their expenses. If additional households claim the standardized medical expense that did not previously claim it, AMHA expects to pay minimal to no additional subsidy per household.
<b>3. Impact on the agency’s waitlist(s) (e.g., any change in the amount of time families are on the waitlist)</b>
No expected impact.
<b>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)</b>
No expected impact.
<b>5. Impact on the agency’s current occupancy level in public housing and utilization rate in the HCV program</b>
No expected impact.
<b>6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice</b>
This activity promotes the MTW statutory goal of cost effectiveness. Staff spends approximately one hour per household verifying medical expenses and 38.2% do not end up impacting the household’s TTP/rent. By moving to a standard deduction, AMHA staff will reduce their time spent verifying and calculating medical expenses.
<b>7. Impact on the agency’s ability to meet the MTW statutory requirements</b>
No expected impact.
<b>8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity</b>
Households with medical expenses greater than \$500 will likely apply for a hardship. Currently, 372 households (59.7% of those claiming medical expenses), receive a deduction of more than \$500. AMHA expects all of these households to apply for and receive a hardship. For these households, the hardship process will be similar to how they have previously submitted their medical expenses in the past during their annual reexamination or for an interim reexamination, so AMHA expects the same



number to submit their expenses for a hardship. AMHA intends to track hardship requests to determine the impact of the policy on families and the amount of staff time spent processing hardship requests.

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

This waiver will only impact, and benefit, elderly and disabled households. Currently, 42.05% of households claiming unreimbursed medical expenses have a head of household that is both elderly and disabled, 29.7% have a head of household who is elderly, and 28.25% have a head of household who is disabled. Households with a disabled head of household are more likely to have expenses under \$500, so will be more likely to claim the standard medical deduction. Households with an elderly head of household are more likely to have costs over \$500, so will be more likely to request a hardship. Households with a head of household who is both elderly and disabled made up a similar proportion of the population with under and over \$500 in expenses.

Female-headed households are more likely to have costs under \$500 when compared to their presence of all households claiming medical expenses, so will be more likely to claim the standard deduction. 67.65% of those under \$500 in expenses are female-headed households compared to 62.76% of all medical expense households. Male-headed households, then, will be more likely to need a hardship. Of households paying over \$500 in medical expenses, 40.26% of them are male-headed households compared to 37.24% male-headed households in all medical expense households. There were no noticeable differences by the head of household's race when comparing the proportion of households under \$500 in comparison to all households with medical expenses.

AMHA will monitor the hardship requests and the application of the standardized medical deduction to ensure all groups continue to have access to any deduction for which they are eligible.