

PHA Name : Akron MHA

PHA Code : OH007

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 1/1/2024

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 2024, AMHA plans to expand on the cost effectiveness strategies proposed in its prior MTW Supplements and seek to expand housing choice for our participants and community.

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. Enrollment into the study has begun and AMHA looks forward to seeing the impact on administrative time and participant growth.

To continue to promote cost effectiveness, AMHA is requesting that all new FSS contracts last for 5 years and allow for a 3 year extension. This method clarifies the process for participants and staff and requires less administrative burden. AMHA is also seeking to end the Earned Income Disallowance exclusion one year sooner than HOTMA provisions require. This exclusion is burdensome to determine, track, and process, so eliminating it will allow AMHA to be more efficient and cost-effective in this way even sooner.

AMHA will improve the cost effectiveness in its public housing program in FY 2024 by offering lease up incentives for units that have been historically difficult to fill; thereby reducing time spent by staff and applicants in preparing eligible applicant files. AMHA will also allow public housing residents that are considered over income (above 120% of Area Median Income) to remain in their public housing unit for three years to assist them in their path to self-sufficiency and reduce the number of unit turnovers.

To promote housing choice, AMHA is proposing four new changes. First, AMHA will offer pre-qualifying inspections for units with accessibility features. This change will shorten the time needed for households to find and lease up in units with the features they require. Second, AMHA will offer vacancy payments to landlords whose households leave the unit under extenuating circumstances (deceased tenant, VAWA). These landlords may need to hold the unit for extra time while a household vacates or have additional expenses that the vacancy loss payment will help to cover. Third, AMHA is introducing a landlord referral program. The referral program will reward both the current and the new landlord so that we can expand the housing opportunities available to our households while also maintaining the current housing supply. Finally, AMHA is requesting to use a portion of its HAP funds for a local, non-traditional (LNT) program. This program will utilize funds for end of life care services for low income individuals that are not on AMHA's traditional housing programs. AMHA hopes to provide care and stability to additional low-income households in our community through this new program.

These changes will continue to bolster AMHA's MTW goals as we expand housing options and 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).

1. Tenant Rent Policies	
a. Tiered Rent (PH)	Currently Implementing
b. Tiered Rent (HCV)	Currently Implementing
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)	Plan to Implement in the Submission Year
w. Alternative Income Inclusions/Exclusions (HCV)	Plan to Implement in the Submission Year
2. Payment Standards and Rent Reasonableness	
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing
3. Reexaminations	
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
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Currently Implementing
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Plan to Implement in the Submission Year
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Plan to Implement in the Submission Year
c. Third-Party Requirement (HCV)	Currently Implementing
6. Short-Term Assistance	
7. Term-Limited Assistance	
8. Increase Elderly Age (PH & HCV)	
9. Project-Based Voucher Program Flexibilities	
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Plan to Implement in the Submission Year
10. Family Self-Sufficiency Program with MTW Flexibility	
d.PH Modify or Eliminate the Contract of Participation (PH)	Plan to Implement in the Submission Year
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Plan to Implement in the Submission Year
11. MTW Self-Sufficiency Program	
12. Work Requirement	
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
Use of Public Housing as an Incentive for Economic Progress (PH)	Plan to Implement in the Submission Year
14. Moving on Policy	
15. Acquisition without Prior HUD Approval (PH)	
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	
b. Service Provision	Plan to Implement in the Submission Year

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

1.a. - Tiered Rent (PH)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative
See AMHA's FY22 MTW Supplement draft for a full description of this activity. AMHA began this activity with 7/1/23 certifications as part of the Rent Reform Demonstration. The Rent Reform Demonstration enrollment period for current

households is 3/1/23-2/29/24 and for new admission households is 7/1/23-6/30/24. 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.

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

Cost effectiveness; Self-sufficiency

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

Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

Non-elderly, non-disabled households currently or newly receiving an HCV or PH subsidy at the time of random assignment. The following households are excluded:

- Head, Co-Head, Spouse aged 56 or older
- Households in the homeownership program
- Current FSS participants
- PH flat rent households

-HCV 0 HAP households

-Special purpose vouchers: VASH, Mod Rehab (Certificate), Enhanced Voucher, Shelter Plus Care, Family Unification Program, Foster Youth, Emergency Housing Voucher, Mainstream, Tenant Protection Voucher

-Mixed eligibility families

-Households living in Jobs Plus developments

-Households receiving Earned Income Disregard (EID) at random assignment

-Households living in developments that underwent a PBRA RAD conversion (not excluded if PBV conversion)

-Households in phase-in period under RAD protections

-Port-outs

-Households who are not yet indicated as disabled according to HUD definition, but: Have been approved to receive SSI/SSDI but have not yet received first payment, or have a pending SSI/SSDI application in (applied recently and waiting to learn of approval status)

Does the MTW activity apply to all public housing developments?

The MTW activity applies to specific developments

Which developments participate in the MTW activity?

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

Not listed specifically because they don't have their own numbers in PIC: Barberton Scattered Sites (Crimson), Harding Rd (Crimson), Jenkins Annex (Willow Run), Lobello Lane (Honey Locust), Maplewood Villa (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.

AMHA began this activity along with the other Rent Reform Demonstration waivers (elimination of deductions and triennial reexaminations) with 7/1/23 certifications. The Rent Reform Demonstration enrollment period for current households is 3/1/23-2/29/24 and for new admission households is 7/1/23-6/30/24. As of 7/1/23, 1,040 current households (HCV and LIPH) have gone through the Rent Reform Demonstration enrollment appointment and have been randomly assigned to standard rent or tiered rent. As of 7/1/23, 214 tiered rent certifications have been processed. AMHA will begin to see the greater cost effectiveness and impacts on self-sufficiency in future years as these households no longer require annual reexaminations.

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.

AMHA received a waiver to make rents affordable at the midpoint of the tier. 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%. AMHA applied this safe harbor change to tiered rents to comply with the Tiered Rent Reform Demonstration, which will reduce cost and achieve greater cost effectiveness in federal expenditures. The Tiered Rent Reform Demonstration will provide valuable information on rent calculation methods to all PHAs and HUD.

Please describe how the income bands are structured?

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 upload the tiered rent policy table that shows the income bands.

This document is attached.

What is the income basis for assigning households to income bands?

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

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

1.b. - Tiered Rent (HCV)

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

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The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

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- Port-outs
- Households who are not yet indicated as disabled according to HUD definition, but: Have been approved to receive SSI/SSDI but have not yet received first payment, or have a pending SSI/SSDI application in (applied recently and waiting to learn of approval status)

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

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

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

This MTW activity applies to all HCV tenant-based units and properties with project-based vouchers that have an eligible household living in them.

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.

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This activity uses a different definition of income because we are using the following MTW waivers (check all that apply)
1.r. and/or 1.s. "elimination of deductions"

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

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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.

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

Cost effectiveness

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

Increased revenue; Decreased expenditures

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

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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 began this activity along with the other Rent Reform Demonstration waivers (tiered rent and triennial

reexaminations) with 7/1/23 certifications. The Rent Reform Demonstration enrollment period for current households is 3/1/23-2/29/24 and for new admission households is 7/1/23-6/30/24. As of 7/1/23, 1,040 current households (HCV and LIPH) have gone through the Rent Reform Demonstration enrollment appointment and have been randomly assigned to standard rent or tiered rent. As of 7/1/23, 214 tiered rent certifications have been processed. AMHA will begin to see the greater cost effectiveness in future years as these households no longer require annual reexaminations.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

Yes

Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)

1.r. - Elimination of Deduction(s) (PH); 1.s. - Elimination of Deduction(s) (HCV); 3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

No

How many hardship requests have been received associated with this activity in the past year?

84.00

How many hardship requests were approved?

84

How many hardship requests were denied?

0

How many are pending?

0

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

No

Does the MTW activity require an impact analysis?

Provided Already

Which deduction(s) will be eliminated, modified, or added?

Dependent allowance; Unreimbursed childcare costs

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

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

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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.

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Program, Foster Youth, Emergency Housing Voucher, Mainstream, Tenant Protection Voucher

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-Households who are not yet indicated as disabled according to HUD definition, but: Have been approved to receive

SSI/SSDI but have not yet received first payment, or have a pending SSI/SSDI application in (applied recently and waiting to learn of approval status)

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

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

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

This activity applies to all HCV tenant-based units and properties with project-based vouchers if an eligible household lives in the unit.

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 began this activity along with the other Rent Reform Demonstration waivers (tiered rent and triennial reexaminations) with 7/1/23 certifications. The Rent Reform Demonstration enrollment period for current households is 3/1/23-2/29/24 and for new admission households is 7/1/23-6/30/24. As of 7/1/23, 1,040 current households (HCV and LIPH) have gone through the Rent Reform Demonstration enrollment appointment and have been randomly assigned to standard rent or tiered rent. As of 7/1/23, 214 tiered rent certifications have been processed. AMHA will begin to see the greater cost effectiveness in future years as these households no longer require annual reexaminations.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Provided Already

Which deduction(s) will be eliminated, modified, or added?

Dependent allowance; Unreimbursed childcare costs

1.t. - Standard Deductions (PH)

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

See AMHA's FY23 MTW Supplement for a full description of this activity. HUD has approved this activity; however, AMHA has not yet implemented it.

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. An impact analysis and full hardship policy were submitted with the FY23 MTW 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.

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

Cost effectiveness

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

Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Elderly families; Disabled families (to the extent those families are not exempt via a reasonable accommodation)

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

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, currently working on implementation

Does this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

No

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

No

How many hardship requests have been received associated with this activity in the past year?

No hardship were requested in the most recent fiscal year.

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

No

Does the MTW activity require an impact analysis?

Provided Already

How much will the single standard deduction be in the Fiscal Year?

\$500

1.u. - Standard Deductions (HCV)

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

See AMHA's FY23 MTW Supplement for a full description of this activity. HUD has approved this activity; however, AMHA has not yet implemented it.

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. An impact analysis and full hardship policy were submitted with the FY23 MTW 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.

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

Cost effectiveness

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

Decreased expenditures

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

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

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

admissions and currently assisted households?
New admissions and currently assisted households
Does the MTW activity apply to all family types or only to selected family types?
The MTW activity applies only to selected family types
Please select the family types subject to this MTW activity.
Elderly families; Disabled families (to the extent those families are not exempt via a reasonable accommodation)
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?
The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.
This activity applies to all tenant-based unit 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, currently working on implementation
Does this MTW activity require a hardship policy?
Provided Already
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?
No
Does the MTW activity require an impact analysis?
Provided Already
How much will the single standard deduction be in the Fiscal Year?
\$500

1.v. - Alternative Income Inclusions/Exclusions (PH)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative
AMHA will no longer offer Earned Income Disallowance (EID) exclusions for any household, including for elderly or disabled individuals (safe harbor request submitted with this Supplement). All households currently under an EID exclusion will continue through the full 24 months of their exclusion. All participants in the Jobs Plus EID will also continue to receive their benefit and Jobs Plus EIDs will continue to be offered. The sections of the Housing Opportunity Through Modernization Act (HOTMA) set to be implemented on 1/1/25 will discontinue EID exclusions, making this waiver only necessary until that time. AMHA believes this administrative efficiency that HUD has recognized the need for is best applied immediately.
Determining eligibility for, processing, and tracking EID exclusions are all very time consuming for AMHA staff. EID exclusions are also a confusing process for participants who can not easily determine how their rent is calculated with the exclusion. The difficulty in processing EIDs can also lead to more rent calculation errors and time spent making corrections.
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 an end to EID exclusions, triennial recertifications, eliminating and/or standardizing deductions, determining rent using income tiers, and utilizing local methods for verification processes.

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

Cost effectiveness

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

Increased revenue; Decreased expenditures

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

The MTW activity applies to all assisted households

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

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

Yes

What is the status of the Safe Harbor Waiver request?

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

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

Earned Income Disallowance Exclusion

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

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

AMHA will no longer offer Earned Income Disallowance (EID) exclusions for any household, including for elderly or disabled individuals (safe harbor request submitted with this Supplement). All households currently under an EID exclusion will continue through the full 24 months of their exclusion. The sections of the Housing Opportunity Through Modernization Act (HOTMA) set to be implemented on 1/1/25 will discontinue EID exclusions, making this waiver only necessary until that time. AMHA believes this administrative efficiency that HUD has recognized the need for is best applied immediately.

Determining eligibility for, processing, and tracking EID exclusions are all very time consuming for AMHA staff. EID exclusions are also a confusing process for participants who can not easily determine how their rent is calculated with the exclusion. The difficulty in processing EIDs can also lead to more rent calculation errors and time spent making corrections.

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 an end to EID exclusions, triennial recertifications, eliminating and/or standardizing deductions, determining rent using income tiers, and utilizing local methods for verification processes.

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

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on

what you know today.
Increased revenue; Decreased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?
The MTW activity applies to all assisted households
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
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?
Yes
What is the status of the Safe Harbor Waiver request?
The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).
What inclusions or exclusions will be eliminated, modified, or added?
Earned Income Disallowance exclusion

2.d. - Rent Reasonableness – Third-Party Requirement (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative
See AMHA's FY22 MTW Supplement 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.
Which of the MTW statutory objectives does this MTW activity serve?
Cost effectiveness
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.
Decreased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?
The MTW activity applies to all assisted households
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 not made any changes during implementation. AMHA thus far has conducted 18 rent reasonableness tests on PBV properties that AMHA owns, manages, or controls. Since these tests were done in house rather sending to a third party, they resulted in reasonable rents and a quicker processing time for the property, AMHA staff, and the household, achieving greater cost effectiveness in federal expenditures.

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

No

Please explain or upload a description of the 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.

No document is attached.

Please explain or upload a description of the rent reasonableness determination method.

See AMHA's FY22 MTW Supplement 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.

No document is attached.

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

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

--Elderly/Disabled Households Triennial Reexaminations):

See AMHA's FY23 MTW Supplement for a full description of this activity. HUD has approved this activity. AMHA anticipates beginning this activity in March 2024, after the one year enrollment period of the Rent Reform Demonstration. When triennial reexaminations begin for these current households, all newly admitted households who meet the above criteria will also be enrolled in triennial reexaminations.

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.

For these households, the standard rent calculation method will be used. 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. An impact analysis and full hardship policy were included with the FY23 Supplement.

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.

--Tiered Rent Demonstration Triennial Reexaminations:

See AMHA's FY22 MTW Supplement for a full description of this activity. AMHA began this activity with 7/1/23 certifications as part of the Rent Reform Demonstration. The Rent Reform Demonstration enrollment period for current households is 3/1/23-2/29/24 and for new admission households is 7/1/23-6/30/24. 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.

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

Cost effectiveness; Self-sufficiency

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

Decreased revenue; Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

--Elderly/Disabled Triennial Reexaminations:

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.

--Tiered Rent Demonstration Triennial Reexaminations:

Non-elderly, non-disabled households currently or newly receiving an HCV or PH subsidy at the time of random assignment. The following households are excluded:

- Head, Co-Head, Spouse aged 56 or older
- Households in the homeownership program
- Current FSS participants
- PH flat rent households
- HCV 0 HAP households
- Special purpose vouchers: VASH, Mod Rehab (Certificate), Enhanced Voucher, Shelter Plus Care, Family Unification Program, Foster Youth, Emergency Housing Voucher, Mainstream, Tenant Protection Voucher
- Mixed eligibility families
- Households living in Jobs Plus developments
- Households receiving Earned Income Disregard (EID) at RA
- Households living in developments that underwent a PBRA RAD conversion (not excluded if PBV conversion)
- Households in phase-in period under RAD protections
- Port-outs
- Households who are not yet indicated as disabled according to HUD definition, but: Have been approved to receive SSI/SSDI but have not yet received first payment, or have a pending SSI/SSDI application in (applied recently and waiting to learn of approval status)

Does the MTW activity apply to all public housing developments?

The MTW activity applies to specific developments

Which developments participate in the MTW activity?

--Elderly/Disabled Triennial Reexaminations:

All public housing developments

--Tiered Rent Demonstration Triennial Reexaminations:

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

Not listed specifically because they don't have their own numbers in PIC: Barberton Scattered Sites (Crimson), Harding Rd (Crimson), Jenkins Annex (Willow Run), Lobello Lane (Honey Locust), Maplewood Villa (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.

--Elderly/Disabled Triennial Reexaminations:

N/a, currently working on implementation

--Tiered Rent Demonstration Triennial Reexaminations:

AMHA began this activity along with the other Rent Reform Demonstration waivers (tiered rent and elimination of deductions) with 7/1/23 certifications. The Rent Reform Demonstration enrollment period for current households is 3/1/23-2/29/24 and for new admission households is 7/1/23-6/30/24. As of 7/1/23, 1,040 current households (HCV and LIPH) have gone through the Rent Reform Demonstration enrollment appointment and have been randomly assigned to standard rent or tiered rent. As of 7/1/23, 214 tiered rent certifications have been processed. AMHA will begin to see the greater cost effectiveness in future years as these households no longer require annual reexaminations.

Does this MTW activity require a hardship policy?

Provided Already

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing

this MTW activity.

AMHA received a waiver to offer temporary hardships to households in the tiered rent demonstration rather than regular interims. AMHA applied this safe harbor change to comply with the Tiered Rent Reform Demonstration, which will reduce cost and achieve greater cost effectiveness in federal expenditures. The Tiered Rent Reform Demonstration will provide valuable information on rent calculation methods to all PHAs and HUD.

Does the MTW activity require an impact analysis?

Provided Already

What is the recertification schedule?

Once every three years

How many interim recertifications per year may a household request?

2 or more

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

--Elderly/Disabled Triennial Reexaminations:

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 were submitted with the FY23 Supplement.

--Tiered Rent Demonstration Triennial Reexaminations:

AMHA's 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. See AMHA's FY22 MTW Supplement for a full description of this hardship policy.

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

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

--Elderly/Disabled Households Triennial Reexaminations:

See AMHA's FY23 MTW Supplement for a full description of this activity. HUD has approved this activity. AMHA anticipates beginning this activity in March 2024, after the one year enrollment period of the Rent Reform Demonstration. When triennial reexaminations begin for these current households, all newly admitted households who meet the above criteria will also be enrolled in triennial reexaminations.

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.

For these households, the standard rent calculation method will be used. 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. An impact analysis and full hardship policy were included with the FY23 Supplement.

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.

--Tiered Rent Demonstration Triennial Reexaminations:

See AMHA's FY22 MTW Supplement for a full description of this activity. AMHA began this activity with 7/1/23 certifications as part of the Rent Reform Demonstration. The Rent Reform Demonstration enrollment period for current households is 3/1/23-2/29/24 and for new admission households is 7/1/23-6/30/24. 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.

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

Cost effectiveness; Self-sufficiency

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

Decreased revenue; Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

--Elderly/Disabled Triennial Reexaminations:

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.

--Tiered Rent Demonstration Triennial Reexaminations:

Non-elderly, non-disabled households currently or newly receiving an HCV or PH subsidy at the time of random assignment. The following households are excluded:

- Head, Co-Head, Spouse aged 56 or older
- Households in the homeownership program
- Current FSS participants
- PH flat rent households
- HCV 0 HAP households
- Special purpose vouchers: VASH, Mod Rehab (Certificate), Enhanced Voucher, Shelter Plus Care, Family Unification Program, Foster Youth, Emergency Housing Voucher, Mainstream, Tenant Protection Voucher
- Mixed eligibility families
- Households living in Jobs Plus developments
- Households receiving Earned Income Disregard (EID) at RA
- Households living in developments that underwent a PBRA RAD conversion (not excluded if PBV conversion)
- Households in phase-in period under RAD protections
- Port-outs
- Households who are not yet indicated as disabled according to HUD definition, but: Have been approved to receive SSI/SSDI but have not yet received first payment, or have a pending SSI/SSDI application in (applied recently and waiting to learn of approval status)

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

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

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

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.

--Elderly/Disabled Triennial Reexaminations:
N/a, currently working on implementation

--Tiered Rent Demonstration Triennial Reexaminations:
AMHA began this activity along with the other Rent Reform Demonstration waivers (tiered rent and elimination of deductions) with 7/1/23 certifications. The Rent Reform Demonstration enrollment period for current households is 3/1/23-2/29/24 and for new admission households is 7/1/23-6/30/24. As of 7/1/23, 1,040 current households (HCV and LIPH) have gone through the Rent Reform Demonstration enrollment appointment and have been randomly assigned to standard rent or tiered rent. As of 7/1/23, 214 tiered rent certifications have been processed. AMHA will begin to see the greater cost effectiveness in future years as these households no longer require annual reexaminations.

Does this MTW activity require a hardship policy?

Provided Already

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.

AMHA received a waiver to offer temporary hardships to households in the tiered rent demonstration rather than regular interims. AMHA applied this safe harbor change to comply with the Tiered Rent Reform Demonstration, which will reduce cost and achieve greater cost effectiveness in federal expenditures. The Tiered Rent Reform Demonstration will provide valuable information on rent calculation methods to all PHAs and HUD.

Does the MTW activity require an impact analysis?

Provided Already

What is the recertification schedule?

Once every three years

How many interim recertifications per year may a household request?

2 or more

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

--Elderly/Disabled Triennial Reexaminations:
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 were submitted with the FY23 Supplement.

--Tiered Rent Demonstration Triennial Reexaminations:
AMHA's 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. See AMHA's FY22 MTW Supplement for a full description of this hardship policy.

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

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

See AMHA's FY22 MTW Supplement for a full description of this activity. HUD has approved this activity and AMHA is currently implementing it. HUD approved the self-certification of assets up to \$50,000 for current households as of 7/1/22 and for applicant households as of 12/1/22.

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.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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.

No changes have been made during implementation. AMHA staff have been able to spend less time verifying current household and applicant assets. The time savings equates to a shortened time until a unit or voucher is offered to an applicant, providing better customer service and faster housing choice. It also means that staff can more quickly process reexaminations. The administrative time saved has been used to implement AMHA's other waivers, such as the Rent Reform Demonstration waivers. From the baseline period before the asset self-certification waiver (7/1/22) through the following year, AMHA counted income from assets for 46% fewer households, but the amount of income from assets actually increased and so AMHA has not had pay additional subsidies despite no longer verifying assets under \$50,000.

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

No

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

\$50,000.

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

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

See AMHA's FY22 MTW Supplement for a full description of this activity. HUD has approved this activity and AMHA is currently implementing it. HUD approved the self-certification of assets up to \$50,000 for current households as of 7/1/22 and for applicant households as of 12/1/22.

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.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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.

No changes have been made during implementation. AMHA staff have been able to spend less time verifying current household and applicant assets. The time savings equates to a shortened time until a unit or voucher is offered to an applicant, providing better customer service and faster housing choice. It also means that staff can more quickly process reexaminations. The administrative time saved has been used to implement AMHA's other waivers, such as the Rent Reform Demonstration waivers. From the baseline period before the asset self-certification waiver (7/1/22) through the following year, AMHA counted income from assets for 46% fewer households, but the amount of income from assets actually increased and so AMHA has not had pay additional subsidies despite no longer verifying assets under \$50,000.

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

No

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

\$50,000.

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

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

--Proposing for FY2024 – Vacancy Loss for Extenuating Circumstances

Owners with units in all zip codes may request a vacancy loss payment for extenuating circumstances. Qualifying circumstances include a deceased tenant with no remaining household member to assume the lease or a move out due to a VAWA situation (Violence Against Women Act). The owner must supply proof of the circumstances as needed. The payment amount will be no more than one month's contract rent of the previous tenant and will be paid when a new HAP contract is executed between the owner and AMHA. The request must be made within 60 days of the new contract date. The goals and larger initiative described in the FY2022 waiver request below will also apply to the extenuating circumstances vacancy loss payments.

--Previously approved for FY2022 – Vacancy Loss in Zip Codes of Opportunity

See AMHA's FY22 MTW Supplement draft for a full description of this activity. This activity has been approved by HUD and was implemented by AMHA 1/1/23.

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 HCV 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.

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

Housing choice
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.
Increased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?
The MTW activity applies only to a subset or subsets of assisted households
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?
New admissions and currently assisted households
Does the MTW activity apply to all family types or only to selected family types?
The MTW activity applies to all family types
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?
The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.
--Extenuating Circumstances: This activity will apply to all tenant-based units and properties with project-based vouchers.
--Zip Codes of Opportunity: 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. AMHA 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.
As of 7/1/23, landlords have made three vacancy loss payment requests. One request was approved and two were denied because the landlord had not yet re-leased the unit. The landlords were instructed to request the vacancy loss payment after they had re-leased the unit if they were still eligible. AMHA is updating this activity in FY 2024 to also offer vacancy loss payments for extenuating circumstances of a deceased household or household requiring VAWA protections.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?
No
Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?)
Certain types of units only
What is the maximum payment that can be made to a landlord under this policy?
The payment will be no more than one month of contract rent of the previous tenant.
How many payments were issued under this policy in the most recently completed PHA fiscal year?
1

What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?

\$507

4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)

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

In order to incentivize new landlords to join the HCV program, AMHA will provide an incentive payment for landlord referrals. When a current landlord refers a new landlord who executes a HAP contract with AMHA, both the current landlord and the new landlord may receive an incentive payment with their next HAP payment (on or after the HAP contract execution for the new landlord). Payments will be no more than one month of contract rent. The new landlord must complete a request for the incentive within 60 days of the new contract date. Referral incentive payments will be limited to 2 payments per calendar year per landlord.

AMHA's goal for this activity is to build on current landlords' positive experiences, knowledge, and networks through referral incentives. The referral incentive encourages new landlords to join the HCV program, but also rewards the long-term landlords for remaining with the program and sharing about HCV. New landlords will then also have a connection to an experienced landlord for advice when going through AMHA's processes for the first time. The referral incentives 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.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

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

No

Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program)?

To all units

What is the maximum payment that can be made to a landlord under this policy?

For the current landlord that is referring a new landlord = \$200.

For the new landlord being referred = \$100.

How many payments were issued under this policy in the most recently completed PHA fiscal year?

0

What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?

\$0

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

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

--Newly proposed for FY2024: Accessibility Features:

AMHA will offer pre-qualifying inspections for units in any zip code with accessibility features for persons with motor/mobility, auditory, or visual impairments. These features may include an accessible building entrance on an accessible route, doors usable by a person in a wheelchair, grab bars, switches/outlets/thermostats in accessible locations, doorbell lights, specialized smoke alarms/carbon monoxide detectors, specific contrasting colors on steps/countertops/sink/door knobs, etc. Persons requiring accessible units often need more time to locate an appropriate unit that meets their needs and so have less time to complete the voucher lease up process. By offering pre-inspections for accessible units, AMHA will lessen the time it takes for the voucher holder to move into an accessible unit and will encourage landlords with these units to rent to AMHA voucher holders. The requirements, goals, and larger initiative described in the FY2022 waiver request below will also apply to the accessible unit pre-qualifying inspections.

Previously approved for FY2022: Zip Codes of Opportunity:

See AMHA's FY22 MTW Supplement 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.

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

Housing choice

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

Neutral (no cost implications)

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

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

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

New admissions and currently assisted households

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

The MTW activity applies to all family types

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

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

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

This activity will apply to units with accessibility features for persons with motor/mobility, auditory, or visual impairments and/or to units in zip codes of opportunity.

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 is currently working on implementation of this waiver, so there are not accomplishments to report at this time. For FY 2024, AMHA is proposing to also allow pre-qualifying units inspections for units with accessibility features.

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

No

How long is the pre-inspection valid for?

The pre-inspection is valid for 90 days.

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

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

See AMHA's FY22 MTW Supplement 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.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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.

Nothing has changed during implementation. For the first half of 2023, AMHA did not have to pay a third party contractor for any PBV inspections at units AMHA owns or has an interest in. In comparison, during FY22, a third party contractor conducted 48 PBV inspections for AMHA. This resulted in more than \$2,000 in cost savings for AMHA and a better continuity of service for our households.

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

No

Please explain or upload the description of 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.

No document is attached.

9.e. - Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)

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

AMHA will allow the use of project-based vouchers (PBVs) for shared housing. The shared housing units may not be owner occupied. AMHA will follow the inspection process utilizing the current HUD inspection method that AMHA uses for all other PBV properties. The PBV units must comply with deconcentration and desegregation requirements under 24 CFR part 903. A subsidy layering review must be conducted. Offering PBVs for shared housing will increase the local housing choices available to AMHA's households. This waiver contributes to our larger project-based voucher reform that includes streamlining inspections and rent reasonableness tests.

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

Housing choice

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

Neutral (no cost implications)

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

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

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

New admissions and currently assisted households

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

The MTW activity applies to all family types

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

The MTW activity applies to all 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

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

No

How many shared housing units does the MTW agency anticipate assisting in the Fiscal Year?

0
How many shared housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?
0
How many manufactured housing units does the MTW agency anticipate assisting in the Fiscal Year?
0
How many manufactured housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?
0

10.d.PH - Modify or Eliminate the Contract of Participation (PH)
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>The Family Self-Sufficiency (FSS) Contract of Participation (CoP) will be modified for new FSS program enrollees to a 5-year period, beginning the first day of the month following the family's enrollment appointment. The modified CoP will also give FSS participants a maximum of 3 years possible extension rather than 2 years. All other changes to the CoP resulting from the FSS Final Rule will remain in the modified CoP.</p> <p>Reverting back to a 5-year contract for all new program participants will be cost-effective by decreasing AMHA's expenditures, as it will require one year less of escrow that AMHA would potentially pay out. This change will still encourage self-sufficiency, as participants will be afforded adequate time to complete their goals and will be eligible for a longer extension if needed.</p> <p>AMHA's goal for this change is to simplify the process of determining the FSS contract end date and ensure consistency in the time offered to participants. Both participants and staff will benefit from the consistency of the new model. Allowing for extensions past 2 years will counteract any lost time on the CoP. Clients will be able to sign the CoP at their enrollment appointment, rather than making a separate appointment once their first certification after FSS enrollment is completed. The modifications will lessen the administrative burden for staff and participants, achieve greater cost-effectiveness in federal expenditures, and eliminate confusion for participants.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Decreased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>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.</p> <p>n/a</p>
<p>Does this MTW activity require a hardship policy?</p> <p>No</p>

No document is attached.

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

No

Does the MTW activity require an impact analysis?

No

No document is attached.

10.d.HCV - Modify or Eliminate the Contract of Participation (HCV)

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

The Family Self-Sufficiency (FSS) Contract of Participation (CoP) will be modified for new FSS program enrollees to a 5-year period, beginning the first day of the month following the family's enrollment appointment. The modified CoP will also give FSS participants a maximum of 3 years possible extension rather than 2 years. All other changes to the CoP resulting from the FSS Final Rule will remain in the modified CoP.

Reverting back to a 5-year contract for all new program participants will be cost-effective by decreasing AMHA's expenditures, as it will require one year less of escrow that AMHA would potentially pay out. This change will still encourage self-sufficiency, as participants will be afforded adequate time to complete their goals and will be eligible for a longer extension if needed.

AMHA's goal for this change is to simplify the process of determining the FSS contract end date and ensure consistency in the time offered to participants. Both participants and staff will benefit from the consistency of the new model. Allowing for extensions past 2 years will counteract any lost time on the CoP. Clients will be able to sign the CoP at their enrollment appointment, rather than making a separate appointment once their first certification after FSS enrollment is completed. The modifications will lessen the administrative burden for staff and participants, achieve greater cost-effectiveness in federal expenditures, and eliminate confusion for participants.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

Does this MTW activity require a hardship policy?

No

No document is attached.

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

No

Does the MTW activity require an impact analysis?

No

No document is attached.

13. - How many months will households be able to remain in a unit while over income? (PH)

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

AMHA will extend the period that a public housing household can be over-income while remaining in public housing with its subsidy. AMHA will extend the time period to 3 years. The over-income limit will continue to be set at 120% of Area Median Income (AMI). AMHA will inform the household of its over-income status approximately 30 days after the completion of the certification in which the household becomes over-income. AMHA will terminate the household's tenancy six months after of the end of the grace period.

The goal of this activity is to be an incentive for the economic progress and the eventual self-sufficiency of the household. If the household is able to remain in their subsidized unit for a longer period paying an affordable rent, they have the opportunity to become more financially stable before exiting the program. This activity also serves to reduce cost and achieve greater cost effectiveness in federal expenditures because the public housing unit will remain leased for a longer period of time, decreasing the turnover and administrative time and cost required to re-lease the unit.

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

Cost effectiveness; Self-sufficiency

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

Increased revenue; Decreased expenditures

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

The MTW activity applies to all assisted households

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

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

No

How many months will households be able to remain in a unit while over income?

36

17.b. - Service Provision

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

--Public Housing Lease Up Incentives:

AMHA will offer a one-time incentive payment of \$100 to new admission public housing households that accept:

1. An efficiency unit or

2. A unit that has had 2 or more consecutive rejections

The incentive will be disbursed to the resident within 45 days of their move in date. The incentive will be a direct payment to the household and will not be in the form of a deduction to the household's rent contribution. The amount of the incentive must not equal more than one month of the applicable unit's rent. AMHA will not spend more than 10% of its HAP budget on local, non-traditional activities. AMHA has reviewed and is subject to Notice PIH 2011-45 or any successor notice and/or guidance.

When an applicant rejects a public housing unit, the result is an administrative burden on AMHA's staff and the applicant. The applicant has supplied all of the proper documentation, the staff have determined the applicant's eligibility, income calculations, and reviewed the available public housing units. When the applicant rejects a unit, all of the time preparing their application has been lost and will need to be re-done should they be offered another unit in the future. AMHA has tracked rejection rates across its properties and unit types. Efficiency units are often passed over because the same applicants are also eligible for 1 bedroom units. Other units may face rejections for a variety of reasons including location, size, rehab status, etc. Offering an incentive to applicants to accept these unit offers will achieve greater cost effectiveness in federal expenditures and lessen the administrative burden on staff and applicants.

--End of Life Care Services

AMHA will competitively bid the option for a third-party provider to provide low-income households with end of life care services. Families may not have access to stable housing and care at the end of life due to lack of resources or gaps in the medical and housing communities. Families may not be able to access AMHA's traditional housing programs due to quickly changing financial and medical needs. AMHA will request bids to provide services to these families to provide compassionate, dignified end of life care.

AMHA will not spend more than 10% of its HAP budget on local, non-traditional activities. Families receiving services through local, non-traditional activities must meet the HUD definition of low-income. AMHA has reviewed and is subject to Notice PIH 2011-45 or any successor notice and/or guidance.

The goal of this activity is to provide support to low-income individuals in our community during the end of life. This method will reach more and new families with AMHA's funding than is possible within the traditional housing programs. This activity fits into AMHA's larger goal of increasing local affordable housing choices to our community in a unique way.

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

Cost effectiveness; Housing choice

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

Increased expenditures

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

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

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

New admissions (i.e., applicants) only

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

The MTW activity applies to all family types

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

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

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

No

What types of services is the MTW agency providing?

--Public Housing Leasing Incentive:

AMHA will offer a one-time incentive payment of \$100 to new admission public housing households that accept:

1. An efficiency unit or
2. A unit that has had 2 or more consecutive rejections

--End of Life Care Services:

AMHA will not provide any services, but will competitively bid the option for a third-party provider to do so.

How many households did the PHA provide services to in the most recently completed PHA Fiscal Year through this activity?

0

Does the MTW activity apply to all LNT units/properties?

Are any families receiving services only (i.e., services only and no housing assistance provided by the PHA)?

Yes

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

0

D.	Safe Harbor Waivers.
D.1	<p>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</p> <p>Yes, the Safe Harbor Waiver request(s) for 1a, 1b, 1v, 1w, 3a, 3b is(are) attached.</p>

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

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2021	\$21,341,280	\$21,341,280	\$0	2029-09-30
2022	\$21,661,780	\$21,661,780	\$0	2030-09-30

G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
	80%-50% Area Median Income	
	49%-30% Area Median Income	
	Below 30% Area Median Income	
	Total Local, Non-Traditional Households	0

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

G.2	Establishing Reasonable Rent Policy.
Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency? Yes	

G.3	Substantially the Same (STS) – Local, Non-Traditional.
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	0 # of unit months
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	0 # of unit months

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

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.	

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.	

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	7/1/2023-6/30/2029	

AMHA MTW 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 participants/residents during its intake and recertification processes. The agency will also consider if a participant/resident qualifies for a hardship exemption at the time of a potential termination of assistance that is due to an MTW activity. When a participant/resident 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.

Hardship Policy: Tiered Rent, Elimination of Deductions, and Triennial Recertifications

Households must apply for all hardship types with the exception of automatic hardships given at the time of the triennial recertification. Hardships may last less than the timeframe listed below if a hardship time period overlaps with a triennial recertification. Approval will be for the following reasons only.

Automatic Hardships:

These hardships may be granted at the time of the triennial recertification for the following reasons. Automatic hardships will last for 12 months.

1. Current gross income is less than the household's retrospective (prior 12 months) income.
2. Childcare expenses total \$2,500 or more annually.*
3. Large family: households with 6 or more dependents will receive a reduction in their gross income of \$1,200.*

*Households will not be eligible to receive both a childcare hardship and a large family hardship. If a household is eligible for both hardships, AMHA will select the most beneficial remedy.

Households may apply for additional hardships, which will last either 6 or 12 months depending on the reason for the hardship.

6 Month Hardships:

1. Temporary decrease in income expected to last between 31 days and 6 months (such as unpaid leave, seasonal employment ending, etc.).
2. Other circumstances: A household may request a hardship exemption for other circumstances not outlined in this policy, such as the death of a family member that impacts the family's finances or a significant increase in reasonable and necessary out-of-pocket expenses because of changed circumstances (for example, a large medical bill). AMHA will consider these requests and appropriate remedies on a case-by-case basis and decisions will be made by a staff member at the supervisor level or higher.

12 Month Hardships:

1. Decrease in income: includes loss of employment or other income.
2. Childcare expenses total \$2,500 or more annually.*
3. Large family: households with 6 or more dependents will receive a reduction in their gross income of \$1,200.*
4. Full-time student status: an adult household member other than the head, co-head, or spouse becomes a full-time student after the effective date of the household's triennial recertification and has earnings that would be excluded under 24 CFR 5.609(c)11.

*Households will not be eligible to receive both a childcare hardship and a large family hardship.

If a household is eligible for both hardships, AMHA will select the most beneficial remedy.

Long Term Hardship:

This hardship will last until the next triennial recertification and will not need to be renewed. Current income will not be reviewed for a long term hardship. Rather, the deceased household member and their income will be removed from the household's record.

1. Death of a household member.

To request a tiered rent hardship exemption, the participant/resident must complete the Tiered Rent Hardship Request form and attach the household's current income and proof of hardship. The form will be made available in an accessible format upon request as a reasonable accommodation. Current proof of all income for all current household members will be required, with the exception of a Long Term Hardship. The request will be reviewed and the household notified of the approval or denial in a timely manner.

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

Prior to the expiration of the tiered rent hardship, the household will be notified of their rent portion set at their last triennial recertification or new admission. Households may request a renewal of their hardship. The request will be treated as a new hardship request and undergo a new determination with current income.

If a household is approved for a hardship, and subsequently experiences another adverse event 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 current income. There is no limit on the number of hardships that a household may receive. If a household is approved for a hardship, they are not required to report subsequent income increases during the period of their approved hardship.

If the head of household, spouse, or co-head becomes elderly or disabled, the household is eligible to be excluded from the tiered rent policy and return to the traditional income-based rent policy.

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.

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.

**Akron Metropolitan Housing Authority
End of Earned Income Disallowance (EID) Exclusion Impact Analysis**

MTW Activities Covered by Impact Analysis
1.v., 1.w. Alternative Income Inclusions/Exclusions
1. Impact on the agency’s finances (e.g., how much will the activity cost, any change in the agency’s per family contribution)
<p>AMHA anticipates a modest decrease in expenses due to decreased staff time spent determining eligibility for an EID exclusion, processing the exclusion, and tracking. In addition there will also be a decrease in expenses spent on training, auditing, and supervisor assistance related to EID exclusions. EID exclusions are administratively burdensome and difficult to identify, process, and explain to participant households.</p> <p>Across both the Housing Choice Voucher (HCV) program and the Low-Income Public Housing (LIPH) program, AMHA has 233 individuals (229 unique households) that are currently utilizing an EID exclusion, which is approximately 2% of AMHA’s total households. All of these households would be able to complete their 24-month EID exclusion period. Based on these numbers, AMHA estimates up to 116 individuals may qualify for an EID during the time period of 1/1/24-12/31/24. On 1/1/25, the Housing Opportunity Through Modernization Act (HOTMA) changes will go into effect eliminating the EID exclusion for all PHAs. Therefore, the impacts discussed here will only apply for one calendar year of EID exclusion enrollment.</p> <p>AMHA estimates that this waiver will save almost \$9,000 in staff costs for determining eligibility, processing, and tracking and an additional \$2,600 for training, auditing, and supervisor assistance. In addition to the direct cost savings, staff will no longer need to learn and need re-trained on EID exclusions, a notoriously difficult topic for both new and current staff. Simplifying the rent calculation process will ease staff burden and encourage employee retention.</p> <p>Eliminating the EID exclusion will decrease AMHA’s per family contribution because less income would be excluded. Based on the average amount excluded due to an EID, AMHA would decrease its per family contribution by \$3,936 annually for an eligible household. So, for the 116 individuals who could receive an EID exclusion in 2024, AMHA would save approximately \$684,864 over the course of 2 years (EID exclusions last for 24 months – 12 months at 100% and 12 months at 50% exclusion).</p>
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)
<p>Individuals currently on an EID exclusion will have no change to their housing costs. Their EID exclusions will continue for the full 24 months. The waiver will only apply to any individual eligible for an EID after 1/1/24. EID exclusions only occur when an eligible household member receives an increase in income. Many times this increase is considered “timely” in that it is not included in the household’s rent calculation until their next recertification. For these households, the impact will be lessened because their income is not counted for a length of time already. Based on the current average EID exclusion amount (\$13,120 annually), for households that would have qualified for an EID exclusion, their housing costs would be approximately \$3,936 higher annually or \$328 higher monthly for the first year and \$1,968 higher the second year (\$164) due to the 50% phase in period. Households will not see a direct increase for “losing” the EID exclusion because they will not have had it and the exclusion is traditionally difficult to explain to households. Rather, it will seem that the household will experience an increase in their portion of rent due to the gaining of new income, which is an expected outcome for households.</p>

3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)
No expected impact.
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)
No expected impact.
5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program
No expected impact.
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice
This MTW activity is expected to assist AMHA in meeting the statutory goal of cost effectiveness by decreasing staff time spent determining eligibility, processing exclusions, tracking, training, and auditing. It will also decrease AMHA's per family contribution. See cost savings estimates in #1 above.
7. Impact on the agency's ability to meet the MTW statutory requirements
No expected impact.
8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity
AMHA is allowing all current EID exclusions to continue for their full term, so we expect this to minimize the number of hardships requested. AMHA expects some households to request a hardship, but this number is difficult to estimate as this waiver removes an exclusion that the household will never have experienced before. The time spent on any hardships requests will be offset by no longer determining eligibility for, processing, and tracking the EID exclusions. 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)
In comparing which household members currently utilize the EID exclusion to all household members on AMHA's HCV and LIPH programs, we found the following: <ol style="list-style-type: none"> 1. Fewer members who are elderly and/or disabled are using the EID exclusion than their representation in all household members. This difference is expected since the EID is only applicable for a member with earned income, which is less common for members who are elderly and/or disabled. 2. In the HCV program, there may be a differential impact on persons with a disability. This impact is because only persons with a disability can qualify for an EID exclusion, so this waiver will only impact them. In in the LIPH program, all household members are eligible for an EID exclusion so that program will not experience the same differential impact. 3. LIPH household members use the EID exclusion more often than HCV household members, so this waiver will impact the LIPH program more. The reason for this difference is that the qualifying factors for an EID exclusion are different across the two programs as stated above.

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: Earned Income Disallowance (EID) Exclusion

If an elderly or disabled individual has a financial hardship, they may request a hardship by completing the Hardship Request Form with an explanation and proof, as needed. 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. The hardship would last until the HOTMA implementation that ends EID exclusions goes into effect, which is expected to be 1/1/25.

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 (01/01/2024), 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


SIGNATURE

9/28/2023
DATE

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

OH007 FY2024 MTW Supplement Public Comments

5-19-23 MTW Advisory Committee Meeting

- Held virtually through Zoom
- 3 AMHA staff
- 6 committee members made up of community stakeholders, HCV participants, LIPH participants, and HCV landlords
- Committee member comment: Move-in incentives will be helpful. AMHA should consider paying them on the utility allowance debit cards that households already receive.
- Committee member comment: Giving a landlord incentive payment to current landlords will help keep them on the HCV program.

8-11-23 MTW/Annual Plan Meeting with Resident Advisory Board

- In person meeting at AMHA's Central Office
- 4 AMHA staff
- 5 LIPH participants
- Participant comment: Do I have to leave the public housing program right away if I start paying full rent?
- Participant comment: How can a resident leave their public housing unit for medical care and how long is allowed?

8-22-23 Stakeholder Meeting (Community Partners)

- Held virtually through Microsoft Teams
- 5 AMHA staff
- 4 community partners from Community Legal Aid, Fair Housing Contact Service, Community Support Services
- No comments received

9-1-23 MTW Advisory Committee Meeting

- Held virtually through Zoom
- 2 AMHA staff
- 3 committee members made up of stakeholders and an HCV participant
- Committee member comment: It seems like AMHA is really responding to the community and getting ahead of challenges.
- Committee member comment: AMHA has hit on a lot of areas. Yes, you do housing, but you're also concerned about people's well-being as well.
- Committee member comment: I am excited to see all that AMHA is doing.

9-8-23 MTW Public Meeting

- In person meeting at AMHA's Central Office
- 2 AMHA staff
- 1 LIPH participant
- 1 HCVP landlord
- Participant comment: What will local, non-traditional services for end of life care look like? What type of housing will be offered? How many people will it help? Will this be open to current AMHA residents?
- Landlord comment: The landlord referral incentive will be a great reward for helping new landlords. She has already been helping other landlords with their forms and inspections for years.

Written Comments Received

- No comments received.

AMHA Tiered Rent Table

Rent calculated at 28% of midpoint of tier

Tier	Tier Income Minimum	Tier Income Maximum	Tiered Rent
1	\$0	\$2,499	\$50
2	\$2,500	\$4,999	\$87
3	\$5,000	\$7,499	\$146
4	\$7,500	\$9,999	\$204
5	\$10,000	\$12,499	\$262
6	\$12,500	\$14,999	\$321
7	\$15,000	\$17,499	\$379
8	\$17,500	\$19,999	\$437
9	\$20,000	\$22,499	\$496
10	\$22,500	\$24,999	\$554
11	\$25,000	\$27,499	\$612
12	\$27,500	\$29,999	\$671
13	\$30,000	\$32,499	\$729
14	\$32,500	\$34,999	\$787
15	\$35,000	\$37,499	\$846
16	\$37,500	\$39,999	\$904
17	\$40,000	\$42,499	\$962
18	\$42,500	\$44,999	\$1,021
19	\$45,000	\$47,499	\$1,079
20	\$47,500	\$49,999	\$1,137
21	\$50,000	\$52,499	\$1,196
22	\$52,500	\$54,999	\$1,254
23	\$55,000	\$57,499	\$1,312
24	\$57,500	\$59,999	\$1,371
25	\$60,000	\$62,499	\$1,429
26	\$62,500	\$64,999	\$1,487
27	\$65,000	\$67,499	\$1,546
28	\$67,500	\$69,999	\$1,604
29	\$70,000	\$72,499	\$1,662
30	\$72,500	\$74,999	\$1,721
31	\$75,000	\$77,499	\$1,779
32	\$77,500	\$79,999	\$1,837
33	\$80,000	\$82,499	\$1,896
34	\$82,500	\$84,999	\$1,954

OH007 FY2024 Response to MTW Supplement Public Comments

Description of how AMHA considered the public comments received:

Commenters felt that offering landlord referral incentives would be beneficial for current landlords by keeping them on the program. It would also reward landlords for the additional work they put in to help their colleagues meet AMHA's requirements. AMHA agrees with this benefit to current landlords and hopes the referral incentives will encourage the current landlords to become marketers of the HCV program and expand the supply of affordable units available to our voucher holders.

An MTW Advisory Committee member felt that move-in incentives will be useful to fill particular units and encouraged AMHA to look at payment methods already available to us. AMHA agreed with this suggestion to use our current utility allowance debit card process to make incentive payments rather than using another third party method that may charge a fee to our households. AMHA plans to implement this suggestion when the waiver has been approved.

A commenter was concerned about the impact on their housing should they begin paying the full amount of rent on their own. AMHA staff were able to explain the current 2 year over income procedures in public housing and also show why AMHA has requested the 2 year grace period be extended to 3 years with an MTW waiver. The additional grace period will allow AMHA's households to increase their income with a safety net of public housing and help them to transition more easily off of the housing program with extra time to prepare.

Commenters were interested in AMHA's plans to pursue local, non-traditional services for end of life care. They questioned what these services might look like, if they would offer housing, how many people would be helped, and if they would apply to current AMHA households. AMHA staff explained that much of this information is not known at this time as AMHA is just now requesting to use part of our funds in this way. AMHA will allow current providers of these services to request AMHA funds to continue serving low-income households with end of life care. Because AMHA has not yet chosen a provider, the specifics could not be given. AMHA residents would not likely be receiving these services because the funds will be for a third party provider to provide end of life care. AMHA is not directly providing the services and our residents are able to remain in their current units while receiving hospice care, etc. as long as the unit meets their needs. The idea of these services prompted one commenter to question how a current AMHA household might leave their public housing unit for medical care and how long they could be gone for. AMHA staff reviewed the absence policy due to medical care with the participant.

Finally, several commenters expressed overall approval of AMHA proposed FY2024 waiver requests. AMHA is thankful for the positive feedback and the commenters' acknowledgement of the community's voice in AMHA's waiver requests.