

# PHA Name : Akron MHA

**PHA Code :** OH007

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

**PHA Program Type:** Combined

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

**MTW Supplement Submission Type:** Annual Submission

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

AMHA envisions 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. Cost effectiveness: We envision rent reform as a way to achieve greater efficiency and remove administrative barriers, thereby producing cost savings to implement innovative quality of life and mobility programs. Self-sufficiency: We envision programs and partnerships that increase access to health, education and employment opportunities so our participants can position themselves out of poverty. Housing choice: We envision a community where our investments in Summit County preserve and improve affordable housing units, increase housing opportunities and choices for our participants, and stabilize families and neighborhoods. AMHA's short-term goals will be focused on streamlining program activities, reducing administrative burden, and increasing units in zip codes of opportunity available to Housing Choice Voucher participants.

The foundation for AMHA's MTW goals will be cost effectiveness as we implement efficiency strategies that maintain the integrity of serving low-income households, while also reducing regulatory administrative burdens. The rent reform required as part of Cohort #2 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 annual certification process for tiered rent participants through triennial recertifications, eliminating deductions, and determining rent using income tiers.

To build on the rent reform efficiencies, we are instituting a local verification method. This method includes allowing verifications to be valid for 180 days, allowing verifications of fixed income sources (social security, pensions, veteran benefits, etc.) to be valid for the full calendar year in which they are effective, accepting written and oral third party verifications as equally valid, allowing self-certification of assets up to \$50,000 for current participants and applicants, and raising the income discrepancy threshold from \$2,400 to \$5,000. These changes will require less document provision by applicants/participants and lessen staff time, while having minimal impact on household rent.

Additionally, AMHA will no longer require a third party to conduct rent reasonableness tests and inspections at project-based properties that AMHA owns, manages, or controls. This change will eliminate administrative time spent acquiring and maintaining a contract, accelerate the rent review/inspection process, and reduce confusion for participants.

AMHA is seeking to increase housing choice for Housing Choice Voucher Participants by offering pre-qualifying unit inspections and vacancy loss payments in zip codes of opportunity in an effort to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity. The vacancy loss payments will offer compensation as landlords wait to receive payment during the lease up process and also encourage landlords to seek out additional voucher tenants, thereby maintaining housing in zip codes of opportunity. Pre-qualifying unit inspections will help landlords better understand the current HUD inspection standards and decrease the time between unit selection and move-in date. Shortening the time period benefits both the landlord (less time without payment) and the participant (new unit available more quickly).

Finally, to promote self-sufficiency, AMHA will utilize triennial recertifications for tiered rent participants, allow HCVP participants receiving zero Housing Assistance Payments (HAP) to remain on the program for 12 months, and consider offering educational workshops. The triennial recertifications offer an opportunity for participants to increase their income without a corresponding increase in rent until their next triennial recertification. By offering 12 months with zero HAP rather than six months, HCVP participants will have a longer period to prepare themselves for exiting the program and feel secure in their current income so that they can successfully transition. Finally, we plan to explore educational workshops for all participants to explain more about AMHA's policies, being a good renter, legal rights and responsibilities, and mobility options. These types of workshops would assist our participants to become successful renters with stable housing and could open opportunities for participants with negative rental history.

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

<b>1. Tenant Rent Policies</b>	
a. Tiered Rent (PH)	Plan to Implement in the Submission Year
b. Tiered Rent (HCV)	Plan to Implement in the Submission Year
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Plan to Implement in the Submission Year
s. Elimination of Deduction(s) (HCV)	Plan to Implement in the Submission Year
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
<b>2. Payment Standards and Rent Reasonableness</b>	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
<b>3. Reexaminations</b>	
a. Alternative Reexamination Schedule for Households (PH)	Plan to Implement in the Submission Year
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
c. Self-Certification of Assets (PH)	Plan to Implement in the Submission Year
d. Self-Certification of Assets (HCV)	Plan to Implement in the Submission Year
<b>4. Landlord Leasing Incentives</b>	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Not Currently Implemented
<b>5. Housing Quality Standards (HQS)</b>	
a. Pre-Qualifying Unit Inspections (HCV)	Plan to Implement in the Submission Year
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
<b>6. Short-Term Assistance</b>	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
<b>7. Term-Limited Assistance</b>	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	

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

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

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 (or, in the HCV program, participant contribution) are fixed. Any income increase within a tier does not affect the household's rent/tenant contribution. Tiers are in \$2,500 increments. That is, the lowest tier includes households with gross income between \$0 and \$2,499; the next tier includes households with gross income between \$2,500 and \$4,999; and so on. The maximum tier goes up to AMHA's area median income.

When a current household begins participating in the tiered rent, they will be assigned to a tier based on their total annual gross income in the prior year (retrospective income). Within each tier, the rent is set to be affordable at the midpoint of the tier (safe harbor request submitted with this Supplement). 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 Low Income Public Housing (LIPH) households will not pay higher than their unit's flat rent, eliminating the need for participants to choose flat or income based rent. For new admissions, households will be assigned to a tier based on their current gross income. Since the income tiers for both new admissions and current participants are based on gross income, the initial rent burden may, at times, exceed 40 percent of the family's adjusted monthly income. Public Housing households with tiered rents will not be eligible to receive the Earned Income Disallowance (EID) in accordance with the Rent Reform Demonstration. These households will realize the same savings through the Rent Reform Demonstration as would have been given them through EID, because their rent portion will not increase due to an increase in income in between triennial recertifications. 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 process for tiered rent participants through triennial recertifications, eliminating deductions, determining rent using income tiers, and utilizing local methods for verification processes.

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

Cost effectiveness; Self-sufficiency

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

Decreased expenditures

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

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

**This MTW activity applies to:**

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

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

OH007000003 Mohawk

OH007000008 Scattered Sites

OH007000014 Joy Park

OH007000015 Van Buren

OH007000024 Bon Sue

OH007000025 Valley View

OH007000029 Honey Locust Garden

OH007000030 Colonial Hills

OH007000034 Pinewood Gardens

OH007000039 Willow Run

OH007000040 Crimson Terrace

OH007000041 Maplewood Gardens

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

n/a

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

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

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

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

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

Each income band covers \$2,500. Within each tier, the rent is set to be affordable at the midpoint of the tier (safe harbor request submitted with this Supplement). 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.

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

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

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

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

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

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

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 (or, in the HCV program, participant contribution) are fixed. Any income increase within a tier does not affect the household's rent/tenant contribution. Tiers are in \$2,500 increments. That is, the lowest tier includes households with gross income between \$0 and \$2,499; the next tier includes households with gross income between \$2,500 and \$4,999; and so on. The maximum tier goes up to AMHA's area median income.

When a current household begins participating in the tiered rent, they will be assigned to a tier based on their total annual gross income in the prior year (retrospective income). Within each tier, the rent is set to be affordable at the midpoint of the tier (safe harbor request submitted with this Supplement). 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 Low Income Public Housing (LIPH) households will not pay higher than their unit's flat rent, eliminating the need for participants to choose flat or income based rent. For new admissions, households will be assigned to a tier based on their current gross income. Since the income tiers for both new admissions and current participants are based on gross income, the initial rent burden may, at times, exceed 40 percent of the family's adjusted monthly income. HCV households with tiered rents will not be eligible to receive the Earned Income Disallowance (EID) in accordance with the Rent Reform Demonstration. These households will realize the same savings through the Rent Reform Demonstration as would have been given them through EID, because their rent portion will not increase due to an increase in income in between triennial recertifications. 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 process for tiered rent participants through triennial recertifications, eliminating deductions, determining rent using income tiers, and utilizing local methods for verification processes.

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

Cost effectiveness; Self-sufficiency

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

Decreased expenditures

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

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

**This MTW activity applies to:**

New admissions and currently assisted households

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

disabled, other).

The MTW activity applies only to selected family types

**This MTW activity applies to the following housing choice voucher unit types:** This 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.**

n/a

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

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

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

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

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

Each income band covers \$2,500. Within each tier, the rent is set to be affordable at the midpoint of the tier (safe harbor requested submitted with this Supplement). 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.

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

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

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

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

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

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

As part of AMHA's tiered rent policy, households participating in this policy will not receive any deductions (e.g., unreimbursed childcare expenses or dependent deductions) from their income. Elderly and disabled households are excluded from the tiered rent policy. Within each tier, the rent is set to be 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%. By calculating the income tiers at 28% of gross retrospective income (current participants) and gross current income (new admissions), some of the impact on participant rent portions is mitigated. In addition, households may apply for hardships for childcare costs above \$2,500 annually and for large families (6 or more dependents) to lessen the effect of the elimination of deductions. An impact analysis on this waiver is included with this Supplement. 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 for tiered rent participants through triennial recertifications, eliminating deductions, determining rent using income tiers, and utilizing local methods for verification processes.

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

Cost effectiveness

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

Increased revenue; Decreased expenditures

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

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

**This MTW activity applies to:**

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

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

OH007000003 Mohawk

OH007000008 Scattered Sites

OH007000014 Joy Park

OH007000015 Van Buren

OH007000024 Bon Sue

OH007000025 Valley View

OH007000029 Honey Locust Garden

OH007000030 Colonial Hills

OH007000034 Pinewood Gardens

OH007000039 Willow Run

OH007000040 Crimson Terrace

OH007000041 Maplewood Gardens

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

n/a

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

**Attached Hardship policy applies to:**

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)}

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

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

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

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

**The Impact Analysis that applies to this MTW activity also applies to the following 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)

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

Dependent allowance;Unreimbursed childcare costs;Other

Households with tiered rents will not be eligible to receive the Earned Income Disallowance (EID) in accordance with the Rent Reform Demonstration. These households will realize the same savings through the Rent Reform Demonstration as would have been given them through EID, because their rent portion will not increase due to an increase in income in between triennial recertifications.

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

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. Within each tier, the rent is set to be 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%. By calculating the income tiers at 28% of gross retrospective income (current participants) and gross current income (new admissions), some of the impact on participant rent portions is mitigated. In addition, households may apply for hardships for childcare costs above \$2,500 annually and for large families (6 or more dependents) to lessen the effect of the elimination of deductions. An impact analysis on this waiver is included with this Supplement. 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 for tiered rent participants through triennial recertifications, eliminating deductions, determining rent using income tiers, and utilizing local methods for verification processes.

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

Cost effectiveness

<p><b>This MTW activity has the following cost implications:</b></p> <p>Increased revenue;Decreased expenditures</p>
<p><b>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.</b></p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p><b>This MTW activity applies to:</b></p> <p>New admissions and currently assisted households</p>
<p><b>An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).</b></p> <p>The MTW activity applies only to selected family types</p>
<p><b>This MTW activity applies to the following housing choice voucher unit types:</b> This activity will apply to all HCV tenant-based unit and properties with project-based vouchers if an eligible household lives in the unit.</p>
<p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>n/a</p>
<p><b>This MTW activity requires a Hardship Policy. The Hardship Policy is attached.</b></p>
<p><b>No hardship were requested in the most recent fiscal year.</b></p>
<p><b>In the prior year, under this activity, Akron MHA MTW agency</b></p> <p>Received 0 hardship requests</p> <p>Approved hardship requests</p> <p>Denied hardship requests</p> <p>There is\are hardship requests pending.</p>
<p><b>This MTW activity requires an Impact Analysis. The Impact Analysis is attached.</b></p>
<p><b>Following deduction(s) will be eliminated, modified, or added.</b></p> <p>Dependent allowance;Unreimbursed childcare costs;Other (please explain)</p> <p>Households with tiered rents will not be eligible to receive the Earned Income Disallowance (EID) in accordance with the Rent Reform Demonstration. These households will realize the same savings through the Rent Reform Demonstration as would have been given them through EID, because their rent portion will not increase due to an increase in income in between triennial recertifications.</p>

**2.d. - Rent Reasonableness – Third-Party Requirement (HCV)**  
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. Market Vision Partners surveys and analyzes market rent data in AMHA's jurisdiction. 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 increases 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 our larger initiative of promoting project-based voucher efficiency by no longer requiring third parties to conduct rent reasonableness tests and inspections for PBV properties that AMHA has an interest in.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

n/a

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

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

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**Following will explain quality assurance method:**

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

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

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.

The PHA will determine and document on a case-by-case basis that the approved rent is reasonable in comparison to rent charged by owners to voucher participants for other comparable unassisted units in the market and will make this method available as needed. This applies to all HCV programs. The PHA will not approve a lease until the PHA determines that the initial rent to owner is a reasonable rent. The PHA must redetermine the reasonable rent before any increase in the rent to owner, and if there is a five percent decrease in the published FMR in effect 60 days before the contract anniversary (for the unit size rented by the family) as compared with the FMR in effect one year before the contract anniversary. The PHA must redetermine rent reasonableness if directed by HUD and based on a need identified by the

PHA's auditing system. The PHA may elect to redetermine rent reasonableness at any other time.

At all times during the assisted tenancy, the rent to owner may not exceed the reasonable rent as most recently determined or redetermined by the PHA. The owner will be advised that by accepting each monthly housing assistance payment s/he will be certifying that the rent to owner is not more than rent charged by the owner for comparable unassisted units in the premises. If requested, the owner must give the PHA information on rents charged by the owner for other units in the premises or elsewhere. The PHA will only request information on the owner's units elsewhere if the PHA has cause to demonstrate that the owner has a tendency to charge higher rents to program participants or if needed for rent reasonableness comparables. The data for other unassisted units will be gathered from an automated database maintained by Market Vision Partners. The market areas for rent reasonableness are census tracts within the PHA's jurisdiction. Subject units within a defined housing market area will be compared to similar units within the same area.

#### Rent Reasonableness Methodology:

##### General Calculations:

- The Akron Metropolitan Housing Authority uses an automated database to make rent reasonableness determinations. The system utilizes regression analysis for unit-to-market comparability. 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:

- Reasonable rents for units constructed in 2002 or later are those determined to be comparable to an excellent/high unit with the consideration of the following features: size (number of qualifying bedrooms), location, unit type, and utilities.
- The County Auditor's report will be used to determine the year of construction. In case of dispute, an initial occupancy permit must be presented.
- A unit in a multi-family building that provides health and safety features as determined by AMHA will be comparable to an excellent/median. AMHA's determination will be based on the following:
  - o The building must consist of 20 units or more; and
  - o On-site security must be provided a minimum of 20 hours per week by an individual with documented certification or training in law enforcement or security whose primary responsibility is providing security services such as screening visitors, controlling access and patrolling the property; and
  - o Demonstrated availability and offer of consistent case management services at least for the household for which the rent reasonableness test is being reviewed.
- The following features will be considered: size (number of qualifying bedrooms), location, unit type, and utilities.

If any unit falls into two categories, the reasonable rents are those determined to be comparable to the higher category with the same features being considered. **and attached for rent reasonableness determination method**

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

For the tiered rent group in the Rent Reform 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. The triennial recertification schedule will also include only reviewing the EIV at the triennial recertification rather than annually, and implementing a release form that is valid for 40 months. In addition, tiered rent households on a triennial recertification schedule will not utilize the IVT Report as this reporting requirement is not consistent with the triennial reporting of income and will create an administrative burden that does not assist in the establishment of the level of subsidy the family receives and will increase administrative burden of PHA staff. Unreported income requires no change or rent correction for triennial tiered rent households unless it occurs during their 12 month retrospective time period, so the IVT Report will not provide any needed information that cannot be gathered from the EIV. PHA staff will continue to monitor the EIV for this group at their triennial recertification to ensure the proper reporting of income. An impact analysis is submitted with this 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. 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 tiered rent participants through triennial recertifications, eliminating deductions, determining rent using income tiers, and utilizing local methods for verification processes.

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

Cost effectiveness;Self-sufficiency

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

Decreased revenue;Decreased expenditures

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

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

**This MTW activity applies to:**

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

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

OH007000003 Mohawk

OH007000008 Scattered Sites

OH007000014 Joy Park

OH007000015 Van Buren

OH007000024 Bon Sue

OH007000025 Valley View

OH007000029 Honey Locust Garden

OH007000030 Colonial Hills

OH007000034 Pinewood Gardens

OH007000039 Willow Run

OH007000040 Crimson Terrace

OH007000041 Maplewood Gardens

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

n/a

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

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

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

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

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

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

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

**Recertification Schedule is**

Once every three years

**Household may request 0 interim recertifications per year.**

AMHA will not allow interim adjustments between the triennial recertifications (safe harbor request submitted with this Supplement). Instead, between triennial reexaminations, a household's tiered rent will change if it is approved for a hardship rent. Hardships must be requested by the household except for automatic hardships offered at the time of triennial recertification if the household's gross current income would place the family in a lower tier than their gross retrospective income, the family has childcare expenses totaling \$2,500 or more annually, or they are a large family (6 or more dependents). Other hardships will last either 6 or 12 months and will only be approved for the following reasons: decrease in income, childcare expenses totaling \$2,500 or more annually, large family (6 or more dependents), change in full-time student status and earnings that would be excluded, and other circumstances as needed (e.g., death in the family, increased expenses, etc.). A household will receive a hardship if its total annual gross income—measured as current/anticipated income or current income after a hardship reduction—drops into a lower tier than the tier they were assigned to at their triennial reexamination. The hardship rent will be the tiered rent that corresponds to their new (lower) tier. However, this hardship is expected to be temporary. The hardship rent may be renewed, if needed, by a new request from the family. But if the hardship rent expires, and the household does not request (or AMHA does not approve) a hardship renewal, then the household's rent will return to the tiered rent assigned at the most recent triennial income reexamination or new admission.

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

For the tiered rent group in the Rent Reform 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. While TTP will not increase, the household's rent may increase if their unit's contract rent is above their payment standard. 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. The triennial recertification schedule will also include only reviewing the EIV at the triennial recertification rather than annually, implementing a release form that is valid for 40 months, and updating the payment standard and utility allowance at the time of a rent increase for the affected households. In addition, tiered rent households on a triennial recertification schedule will not utilize the IVT Report as this reporting requirement is not consistent with the triennial reporting of income and will create an administrative burden that does not assist in the establishment of the level of subsidy the family receives and will increase administrative burden of PHA staff. Unreported income requires no change or rent correction for triennial tiered rent households unless it occurs during their 12 month retrospective time period, so the IVT Report will not provide any needed information that cannot be gathered from the EIV. PHA staff will continue to monitor the EIV for this group at their triennial recertification to ensure the proper reporting of income. An impact analysis is submitted with this 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. 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 tiered rent participants through triennial recertifications, eliminating deductions, determining rent using income tiers, and utilizing local methods for verification processes.

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

Cost effectiveness;Self-sufficiency

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

Decreased revenue;Decreased expenditures

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

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

**This MTW activity applies to:**

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

**This MTW activity applies to the following housing choice voucher unit types:** This activity will apply to all HCV tenant-based unit 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.**

n/a

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

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

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

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

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

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

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

**Recertification Schedule is**

Once every three years

**Household may request 0 interim recertifications per year.**

AMHA will not allow interim adjustments between the triennial recertifications (safe harbor request submitted with this Supplement). Instead, between triennial reexaminations, a household's tiered rent will change if it is approved for a



hardship rent. Hardships must be requested by the household except for automatic hardships offered at the time of triennial recertification if the household's gross current income would place the family in a lower tier than their gross retrospective income, the family has childcare expenses totaling \$2,500 or more annually, or they are a large family (6 or more dependents). Other hardships will last either 6 or 12 months and will only be approved for the following reasons: decrease in income, childcare expenses totaling \$2,500 or more annually, large family (6 or more dependents), change in full-time student status and earnings that would be excluded, and other circumstances as needed (e.g., death in the family, increased expenses, etc.). A household will receive a hardship if its total annual gross income—measured as current/anticipated income or current income after a hardship reduction—drops into a lower tier than the tier they were assigned to at their triennial reexamination. The hardship rent will be the tiered rent that corresponds to their new (lower) tier. However, this hardship is expected to be temporary. The hardship rent may be renewed, if needed, by a new request from the family. But if the hardship rent expires, and the household does not request (or AMHA does not approve) a hardship renewal, then the household's rent will return to the tiered rent assigned at the most recent triennial income reexamination or new admission.

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

AMHA will allow participants and applicants (through a safe harbor waiver) to self-certify their assets up to \$50,000. This waiver will improve cost effectiveness in our effort to reduce administrative burden while still maintaining the integrity of the rent calculation process. Staff spend onerous amounts of administrative time verifying assets that do not impact participants' rent portions. Participants know the approximate balances in their accounts and rarely receive interest payments. By allowing them to self-certify, we will free up staff time to accomplish other tasks and require less burdensome documentation of participants. This waiver contributes to our larger rent reform initiative, which seeks to achieve greater efficiency and remove administrative barriers.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

n/a

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

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

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

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

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

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

\$50,000.

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

AMHA will allow participants and applicants (through a safe harbor waiver) to self-certify their assets up to \$50,000. This waiver will improve cost effectiveness in our effort to reduce administrative burden while still maintaining the integrity of the rent calculation process. Staff spend onerous amounts of administrative time verifying assets that do not impact participants' rent portions. Participants know the approximate balances in their accounts and rarely receive interest payments. By allowing them to self-certify, we will free up staff time to accomplish other tasks and require less burdensome documentation of participants. This waiver contributes to our larger rent reform initiative, which seeks to achieve greater efficiency and remove administrative barriers.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

n/a

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

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

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

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

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

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

\$50,000.

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

AMHA will offer vacancy loss payments to landlords in AMHA determined zip codes of opportunity that re-lease a unit to a voucher holder after a previous voucher holder has vacated the unit. The payment amount will be no more than one month's contract rent of the previous tenant. The landlord must re-lease the unit to a new voucher holder within 3 months of the AMHA recorded move-out date of the previous tenant and will be paid when the new HAP contract is executed between the owner and AMHA. The goal of this activity is to incentivize landlords to continue their participation in the HCVP program and to maintain the availability of units in zip codes of opportunity. The vacancy loss payments are part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity. The vacancy loss payments will offer compensation when landlords keep units available during the RTA and inspection process (a deterrent for some landlords) and also encourage landlords to seek out additional voucher tenants rather than relying on the open market, thereby maintaining housing in zip codes of opportunity. AMHA's Administrative Plan has been updated to reflect this vacancy loss policy.

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

Housing choice

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

Increased expenditures

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

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

**This MTW activity applies to:**

New admissions and currently assisted households

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

The MTW activity applies to all family types

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

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

n/a

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

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

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**This policy applies to**

Certain types of units only

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

Units in particular types of areas or neighborhoods

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

**Maximum payment to the landlord is**

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

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

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

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

AMHA will offer pre-qualifying inspections for units in AMHA determined zip codes of opportunity. These areas are those AMHA provides an increased payment standard to due to higher cost rental units, fewer voucher holders living in these areas, and opportunities available to residents in the area. PHA staff review these areas annually. To be used in lieu of a move-in inspection, the pre-inspection must have been conducted within 90 days of the AMHA approved move in date. Participants will be able to request an interim inspection after move in as needed. One of the safe harbors for this waiver states that "HQS inspection standards must not be altered as found at 24 CFR 982.401." At this time, AMHA is participating in the UPCS-V demonstration, so will continue to follow the UPCS-V inspection standards until the demonstration ends. No additional waiver is needed to continue using the UPCS-V inspection standards while AMHA is in the UPCS-V demonstration.

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. New landlords can understand the current HUD inspection standards through a pre-qualifying inspection, quickly make their repairs, and then be ready for a voucher holder tenant. The voucher holder will be able to move into the unit faster because they will not be waiting on an inspection, which may fail the first time and take more time to pass a re-inspection. Landlords will decrease their vacancy time and income lost. 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. Pre-qualifying unit inspections will shorten the timeframe landlords must wait during the RTA and normal inspection process (a deterrent for some landlords) and ensure more quality units are available to voucher holders.

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

Housing choice

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

Neutral (no cost implications)

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

The MTW activity applies only to a subset or subsets of assisted households
<p><b>This MTW activity applies to:</b></p> <p>New admissions and currently assisted households</p>
<p><b>An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).</b></p> <p>The MTW activity applies to all family types</p>
<p><b>This MTW activity applies to the following housing choice voucher unit types:</b> This activity will apply to units in zip codes of opportunity. In these zip codes, AMHA currently offers an increased payment standard due to higher cost rental units, fewer voucher holders living in these areas, and opportunities available to residents in the area. PHA staff review these areas annually.</p>
<p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>n/a</p>
<p><b>No hardship were requested in the most recent fiscal year.</b></p>
<p><b>In the prior year, under this activity, Akron MHA MTW agency</b></p> <p>Received 0 hardship requests</p> <p>Approved hardship requests</p> <p>Denied hardship requests</p> <p>There is\are hardship requests pending.</p>
<p><b>The pre-inspection is valid for</b></p> <p>90 days.</p>

<p><b>5.c. - Third-Party Requirement (HCV)</b></p> <p>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; wherein the Quality Control Inspector re-inspects a random sample of current inspections throughout the year. This quality assurance method is available to anyone who would request it. Participants will also be able to request an interim inspection at any time if they feel an inspection need was not met. At the Department's request, the agency must obtain the services of a third-party entity to determine if PHA-owned units pass HQS (or UPCS-V in AMHA's case). One of the safe harbors for this waiver states that "HQS inspection standards must not be altered as found at 24 CFR 982.401." At this time, AMHA is participating in the UPCS-V demonstration, so will continue to follow the UPCS-V inspection standards until the demonstration ends. No additional waiver is needed to continue using the UPCS-V inspection standards while AMHA is in the UPCS-V demonstration.</p> <p>Requiring approval from a third party increases costs and creates potential delays in the availability of needed housing units, while adding no measurable value to the process. 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.</p>
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**This MTW activity serves the following statutory objectives:**

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

n/a

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

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

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**The quality assurance method:**

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

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

<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<b>Safe Harbor Waivers seeking HUD Approval:</b> Please see attached for Safe Harbor Waivers requested this year.

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>
<b>E.1</b>	<b>Agency-Specific Waiver(s) for HUD Approval:</b>  The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, Agency-Specific Waivers may be requested.  Please see attached for Agency-Specific Waiver(s) requested this year.
<b>E.2</b>	<b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b> MTW Agency does not have approved Agency-Specific Waivers

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

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

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

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

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>
MTW agency established a rent reform policy to encourage employment and self-sufficiency	

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

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

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



Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	
2 Person	
3 Person	
4 Person	
5 Person	
6+ Person	
Totals	0

H.	Public Comment
	Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.
	Please see attached for an additional public hearing held for Agency-Specific Waiver(s) and/or Safe Harbor Waiver(s)

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

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

Title and short description	Evaluator name and contact information	Time period	Reports available
Stepped and Tiered Rent Demonstration. AMHA's participation in the second cohort of the MTW Expansion will evaluate alternative rent policies designed to increase resident self-sufficiency and reduce PHA administrative burdens. An independent research team lead by MDRC will work with HUD and the selected PHAs to assist in implementation and evaluate the effects of the alternative rent policies.	James Riccio, MDRC James.Riccio@mdrc.org	8/1/2022-7/31/2029	n/a

## **OH007 FY2022 MTW Supplement Agency Specific and Safe Harbor Public Comments**

### **11-19-21 MTW Advisory Committee Meeting**

- Held virtually through zoom, discussed possible waivers for 7/1/22 MTW Supplement
- 14 participants (AMHA staff, community partners, HCVP/LIPH participants, HCVP landlord)
- HCVP participant comment: Allowing participants to stay on the program for 12 months, instead of only 6, will provide more security for participants in knowing they have successfully paid the rent for a full year.
- HCVP landlord comment: Some landlords are willing to lower their rent to keep good renters and this change would allow those participants to pay the full rent, but also stay on the program longer.
- LIPH participant comment: Need connection to services for those that are paying their full rent to prepare for being off the voucher program.

### **2-16-22 MTW Safe Harbor & Agency Specific Meeting**

- Held virtually through zoom, presented powerpoint presentation
- 6 AMHA staff
- 13 HCVP or LIPH participants
- Participant comment: What happens when someone leaves the HCVP program after being at 0 HAP for 12 months?
- AMHA staff comment: Allowing the self-certification of assets for applicants will help so much increasing efficiency. It takes so long for application staff to collect and re-collect asset documentation. This change will be a big relief to them.

### **3-1-22 MTW Safe Harbor & Agency Specific Meeting**

- Held virtually through zoom, presented powerpoint presentation
- 3 AMHA staff
- 14 HCVP or LIPH participants
- Participant comment: Can you explain the MTW Program?
- Participant comment: I like the changes that are happening with the program. I am an older participant and have been on the HCV program for 15+ years. How will this program work better for my age and have more senior units available?
- Participant comment: Will HUD consider changing the name away from “Section 8?” This terminology has a stigma attached to it and so does the term “voucher.” Using the word “certificate” would be better because it sounds like it is earned rather than a hand out.
- Participant comment: Will we receive another letter about another meeting? I like receiving notification through the mail.

**Description of how AMHA considered the above comments:**

AMHA agrees that allowing participants to remain on the HCV program for 12 months at 0 HAP, rather than 6 months, will likely provide a feeling of confidence and security in continuing to pay the full rent on their own after HCV termination. It will also allow them time to become more financially stable if they can pay down other debts or bills before they exit the program and no longer have the safety net of the HCV program. AMHA plans to connect with participants at 0 HAP via mail, which is currently in place, and also via phone calls and/or emails to ensure the participants understand when they will be leaving the program and assist them in connecting to services they might need once they have exited the HCV program. All households will be eligible to reapply for housing assistance after they are terminated from the HCV program for remaining at 0 HAP for 12 months.

AMHA agrees with the staff member that stated allowing applicants to self-certify their assets will increase efficiency.

AMHA included landlord incentives in zip codes of opportunity, including for senior buildings, in our first MTW Supplement as staff have heard from participants, landlords and community members that AMHA needs additional ways to recruit and maintain landlords. AMHA will review how the chosen landlord incentives impact available units and will consider additional incentives in future years.

In response to the comment about Section 8, AMHA shared that the name of the program changed to the Housing Choice Voucher Program approximately 20-25 years ago. AMHA staff work diligently to use the correct terminology and explain the strengths of our families to landlords and the public. In May 2021, the City of Akron passed source of income protections for renters to help with this stigma. However, these protections do not apply to AMHA's entire jurisdiction.

AMHA will continue to promote public meetings for feedback and reach out to participants and community stakeholders through a variety of methods. AMHA will consider post cards as a more cost effective way to reach participants by mail. AMHA staff also shared with the meeting participants when the next round of public meetings will occur for the FY2023 plan and how to check the AMHA website and local newspaper for meeting dates and times.

**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 ( 0/01/2022 ), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

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**



4/6/2022

**SIGNATURE**

**DATE**

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

## **OH007 FY2022 MTW Supplement Public Comments**

### **10-29-21 MTW Advisory Committee Meeting**

- Held virtually through Zoom
- 13 participants (AMHA staff, community partners, HCVP/LIPH participants, HCVP landlord)
- What changes to AMHA's programs or rules would you like to see (towards the 3 MTW goals)?
  - Link AMHA's current programs to more services and offer more service options
    - Supportive employment, job coaches, etc.
    - Financial resources and planning
    - Utilize services offered through DJFS - subsidized employment available for ages 18-24, financial literacy programs
  - Participant education/communication
    - Determine what skills are needed, especially for those newly entering housing
    - Address fears around losing housing and other assistance
    - Build relationships with participants to foster welcoming environment rather than authoritative
    - Tenant/landlord education and rental practices
    - AMHA policies and procedures – consider having a 3<sup>rd</sup> party do this to create a more open atmosphere
  - Find ways to address the “benefits cliff” when participants start to work their way out of poverty and increase their income, then quickly lose benefits they depend upon (food stamps, childcare assistance, housing, Medicaid, etc.)

### **11-19-21 MTW Advisory Committee Meeting**

- Held virtually through Zoom
- 14 participants (AMHA staff, community partners, HCVP/LIPH participants, HCVP landlord)
- Possible waivers of current program requirements for FY2022 MTW Plan
  - Required with income tier demonstration
    - Triennial recertifications for tiered rent group
    - No deductions for tiered rent group except for childcare hardships
      - Concern for families – considering determining rent at 28% of income instead of 30% and/or offering some kind of hardship deduction for larger families
  - Landlord incentives (possible options) (housing choice)
    - Damage claims above the security deposit up to one month's contract rent
      - AMHA staff member: This is a common complaint in HCVP
    - Pre-qualifying unit inspections to move the lease up process along faster
      - Fair Housing: waiting time to move in as a big concern
      - Landlord: Need to encourage diversity in AMHA's inspectors and to work to ensure consistency in inspections
    - Vacancy loss payments between voucher tenants up to one month
    - One-time leasing incentives in opportunity areas
    - Additional suggestion from meeting participant: offer incentive for passing the first inspection

## 1-14-22 MTW Advisory Committee Meeting

- Held virtually through Zoom
- 11 participants (AMHA staff, community partners, HCVP/LIPH participants, HCVP landlord)
- Waivers we are applying for in year 1: based on feedback from the Committee, staff, strategic plan info, currently participant survey still ongoing
  - Landlord incentives in zip codes of opportunity (possibly expand in the future)
    - Pre-qualifying unit inspections
      - How are we marketing this to the LLs?
        - CSS has done in the past – inspectors sell it as they go out
        - AMHA staff to promote it – word of mouth
        - Landlord Portal, newsletter
        - Need them to sign anything saying they'll put a tenant in there?
          - HCVP staff: it could be helpful to have them sign something, not extensive
        - Market to voucher holders
          - Let them know that the unit is available and already passed inspection
        - Facebook page
        - Reach out to County & City to connect with owners on their landlord list? AMHA staff have been working through that list
        - Inspection Supervisor doing LL meetings 1 on 1, larger meeting space will be back in use in next 30 days – February/March meetings to start promoting?
          - Fair Housing has had success with virtual landlord meetings, they can market as well
        - Committee members can pass out flyers to businesses near them
    - Rent Reform
      - Triennial recertifications for tiered rent group
        - HCVP participant: 3 years without a rent increase gives someone a reason to set a goal and feel motivated, might have the goal, but needs the assistance to find the steps to achieve that goal

## 2-9-22 Staff Meeting

- Held virtually through Microsoft Teams, presented powerpoint presentation
- 30 AMHA staff attendees
- Waiver 5.a., Pre-qualifying unit inspections
  - In the current process, when the inspector does a move-in inspection they have an RTA, which has fields indicating the year the unit was constructed and whether the family has a child under age six (or if a family member is pregnant). If an inspector determines that a unit has paint in such a condition that a lead paint Risk Assessment would be warranted, they refer to the RTA and flag the unit if it was built prior to 1978 and there is a child under age six (or a pregnancy) in the household. In doing a pre-qualifying inspection without the RTA, the inspector would not have this information available to them. We may want to consider a document that we present to the landlord/agent at the completion

of a pre-qualifying inspection, laying out the parameters of the pre-qualifying inspection, and dependencies based on factors like this one. There is also a concern that the landlord would then not accept RTAs from a family with small children if they're aware that we would require a Risk Assessment. On the one hand that could reduce the number of delays in providing housing since the landlord knows this going in, but it could also lead to unintended prejudice in the process. Regardless, we'll need to make a determination on how to deal with this absence of information at the time of the pre-qualifying inspection.

- Will we make sure the unit is empty before doing a pre-qualifying unit inspection? At times landlords submit RTAs for occupied units, so there is no question there will be some who will ask us to come out too early in the MTW program. We'll have to make confirming the unit is empty part of the pre-qualifying scheduling process.
- A landlord can lose Biennial inspection status when five or more Special-Complaint inspections are requested for their properties over a two year period. With a passed pre-qualifying inspection being good for 90 days, there is the possibility that something could go wrong in the interim (e.g. a thermostat or water heater goes out). The addendum reads: "Participants will be able to request a special/complaint inspection after move in as needed." That is open to interpretation and the new tenant may be someone who is never satisfied with their surroundings, meaning the landlord could be penalized "after the fact" if the new tenant calls for a special inspection. We're working hard to retain landlords in a very difficult market and I would be concerned about using a newly implemented process to weed out good landlords from bad.
- Waivers 1.a., 1.b., Tiered Rent
  - What about seasonal work for hardships? Participants with this type of income always have decreased income at a certain time of year, so if hardships last for 12 months, they're right back to 0 income again.
  - How does the MTW program affect the FSS program? Will that program move to MTW and will participants still have the opportunity to utilize the FSS program? If they are tiered rent participants and they move into the FSS program will they be able to request to process an income change that will increase their escrow amounts?
  - If there is an adult in the household that is zero income, per our policy now, once they obtain income we would process an income change to increase their annual income. Per the MTW policy, there would not need to be an income change processed due to the increased income, correct?
  - What happens with tiered rents at rent increases?
  - What if a household is excluded because of participation in FSS or JPEID and they either end/graduate the FSS program or move from the Jobs Plus area to another development. Would they then be checked at the next standard annual recertification for the potential to be in the study?
- Waivers 1.r., 1.s., Elimination of Deductions
  - In taking away deductions, the clients will no longer receive the benefit of reduced rental portions based on those deductions, will there be a change in the percentage of income counted for their adjusted income? Portage MHA used 29%, will there be something like that in this module? Also, will there be a change on the Contract and Leasing end where staff use up to 40% of adjusted income, will that be increased too? Portage used 50%, not sure if AMHA is looking into that as well or if it would even be an option.



- Other comments:
  - Was there any thought on restricting portability? Portage MHA restricts participants from porting to a PHA where the payment standards are more and they are not absorbing. Of course, reasonable accommodations and VAWA were still applicable.
  - How will we be tracking data? I would presume via Tenmast. Portage MHA had issues with Yardi and had to use spreadsheets and rely on employees to input the info.

### **2-11-22 MTW/Annual Plan Meeting with A-CAN**

- Held virtually through Microsoft Teams, provided presentation handouts
- 4 AMHA staff
- 4 LIPH participants
- Participant comment: Would like to see triennial recertifications for senior/disabled households.
- Participant comment: Interested in the 3 year stable rent because considering part-time work and this would be nice to not have to see the rent change for 3 years.
- Participant comment: Would the change to triennials start right away? Would prefer it to be sooner for elderly/disabled households to go to triennials because it takes time and can be a hassle to complete the recertification paperwork.

### **2-16-22 MTW Public Meeting**

- Held virtually through zoom, presented powerpoint presentation
- 6 AMHA staff
- 13 HCVP or LIPH participants
- Participant comment: Besides vacancy loss payments and pre-qualifying inspections are there additional waivers AMHA is working toward to bring more units onto the program? Participant has personally worked with landlords to buy and rehab properties so that their cost is lower and make them more willing to rent to a voucher holder. She suggested we work with the City of Akron land bank and persons who might be interested in buying property to rent to voucher holders.
- Participant comment: It seems that AMHA wants us all to be a part of MTW, but so many groups are excluded from the tiered rent study. Why is that?
- Participant comment: Why didn't we find out sooner about MTW?

### **3-1-22 MTW Public Meeting**

- Held virtually through zoom, presented powerpoint presentation
- 3 AMHA staff
- 13 HCVP or LIPH participants
- Participant comment: If I have bad credit, will this interfere with the MTW Program?
- Participant comment: Do I have to be part of the study?
- Participant comment: I would like to be a part of the study and the tiered rent group.

- Participant comment: Will this program help me to buy a house? Can I own a home through your program?
- Participant comment: Will more information about this program be mailed to me?
- Participant comment: I need to move in the near future, can any of these changes help me move?
- Participant comment: Can I move sooner than July?

### **3-4-22 Stakeholders Meeting**

- Held virtually through zoom, presented powerpoint presentation
- 2 AMHA staff
- 4 community partners from Community Legal Aid, Fair Housing Contact Service, Tri-County Independent Living Center
- Stakeholder comment: Can accessible units be included in the pre-qualifying unit inspections to ease the moving process for these households?
- Stakeholder comment: During the annual recertification process, will there be a reminder for households of the hardship policies, when rent will return to a higher amount, and that their rent portion could increase at their next triennial recertification?
- Stakeholder comment: How much documentation will be required for households requesting a hardship?
- Stakeholder comment: Is there a review process built into the MTW Program for protected classes, etc.?

### **3-18-22 MTW Advisory Committee Meeting**

- Held virtually through Zoom
- 11 participants (AMHA staff, community partners, HCVP/LIPH participants, HCVP landlord)
- Fair Housing: what language will be used to inform households of the rent reform changes? Fair Housing wants to be able to use the same language when talking with clients.
- How can AMHA assist in moving concerns?
  - Fair Housing is open to any ideas. The main complaints they hear are inspection time, inspection details, rent rates.
    - AMHA requested Fair Housing to start asking bedroom size of rent rate concerns to see if AMHA needs to review payment standards.
    - AMHA increased 1 and 2 bedroom payment standards in September 2021.
    - Fair Housing: the market is very tight right now, so it's difficult for everyone to find a unit.
  - HCVP Participant: barriers include application fees, background checks, landlords wanting first and last month's rent, plus a security deposit.
  - Fair Housing: Some households in the City of Akron still getting turned away for using voucher even though source of income protection has been enacted for at least 6 months.
    - Fair Housing is sending letters to any instances they know of, trying to be proactive rather than punitive at this stage.
  - HCVP landlord: some landlords are taking advantage of the situation and trying to get more, he is satisfied with the amount he receives for his properties on the HCV Program.
    - The increase in payment standards for 1 and 2 bedroom units really helped.

- AMHA's payments are guaranteed, which he tells other landlords to encourage them to join the program.
- Communication
  - Need reminders, suggestions from participants: letters, emails, text messages, portal, AMHA app, multiple newspapers, post information at libraries and community centers.

## **OH007 FY2022 Response to MTW Supplement Public Comments**

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

The MTW Advisory Committee and other public comments discussed the need for appropriate communication. AMHA will use standardized language when discussing the upcoming changes, particularly related to rent reform. AMHA will share this language with its partners so that everyone can speak easily about it together and with our shared clients. AMHA plans to create educational videos and/or workshops for participant households, landlords, etc. to increase access to information and improve the housing experience. AMHA also will continue to provide information on MTW changes, hardship policies, rent reform, etc. in understandable language and through multiple methods and will consider additional technology and/or traditional mailing methods to reach more households. Despite the multiple methods used for getting information about MTW out to AMHA's households, one commenter wanted to know why they had not heard about the program sooner. This comment highlights AMHA's need to continue to be innovative and inclusive in our communication efforts. For AMHA's new landlord incentives, we will promote through our partners, staff members, social media and AMHA's website and also share these changes with the voucher holders so they are aware of what units have passed inspection or incentives to encourage new landlords to join the HCV program. While a waiver is not needed to address communication, it does shape how we go about making our program changes.

Commenters questioned how AMHA plans to track its data and build in a review process for protected classes. AMHA plans to utilize reports within its software system, Tenmast, to track tiered rents, triennial recertifications, hardship requests, landlord incentives, and allowing HCV participants to remain on the program at 0 HAP for 12 months. AMHA will also use Tenmast reports for internal monitoring of the impact on protected classes. Certain MTW waivers require an impact analysis, which includes effects on protected classes. These will be published along with the MTW Supplement each year. MDRC, who is evaluating the Tiered Rent Reform Demonstration, will also be evaluating the changes on AMHA households from rent reform. And while SEMAP and PHAS scores are no longer required now that AMHA is an MTW housing authority, there will be an AMHA version of these scoring mechanisms to ensure we are meeting our goals.

The MTW Advisory Committee also expressed concern over the "benefits cliff" for AMHA households. To address this concern, AMHA has requested an agency specific waiver to allow HCVP participants to remain on the HCV program for 12 months at zero HAP, extending the currently allowed time period by 6 months. AMHA plans to connect with these households, as well as households affected by the over income rule in low income public housing, to ensure they understand how their income is impacting their housing and connect them to services, as needed, as they leave assisted housing.

In moving to tiered rent, staff commenters questioned the tiered rent policy's impact on seasonal employment, FSS, reporting new income, and rent increases. AMHA adjusted its hardship policy based on the feedback for seasonal employment so that rather than receiving 12 months of hardship rent, households experiencing a decrease in income due to seasonal employment will only receive a hardship rent for 6 months. This hardship can be renewed as needed. Increases in income will not need to be reported, including for an adult who was previously at zero income. This income will be captured at the next triennial recertification. One commenter questioned how much documentation would be needed to request a hardship. All current household income must be provided along with a hardship request form. No form will be required for automatic hardships at the time of recertification. AMHA will make the list of required documents clear during the hardship request process and at other client contact times to avoid unnecessary hardship denials for missing documentation. In terms of FSS, the program will continue now that AMHA is an MTW PHA. And while current FSS participants are excluded from the Tiered Rent

Reform Demonstration, once households are enrolled, they are still eligible to join the FSS program and receive the benefits. The difference will be that for tiered rent households, their escrow amount will be adjusted at the triennial recertification rather than at the annual recertification and they cannot request interim increases to increase their escrow. At the time of a rent increase, household's TTPs will not change, but their rent portion may change if the unit's gross rent goes above their payment standard.

Several commenters wondered about how the loss of deductions would affect our households, particularly households with children who previously received a dependent deduction. AMHA and the other Cohort 2 tiered rent PHAs successfully requested HUD and MDRC to adjust the percentage of income used to calculate household's tiered rent to 28% to adjust for the loss of deductions. AMHA also included a hardship for large families (those with 6 or more dependents). Using 28% of income and offering a large family hardship mitigates much of the increase in household rent portions.

Many commenters were in support of triennial recertifications. In response to this support, AMHA plans to expand triennial recertifications to elderly and disabled households in its FY 2023 or 2024 MTW Supplement.

One commenter was concerned why so many households are excluded from the Tiered Rent Reform Demonstration. AMHA staff explained the boundaries of the rent reform study that we could not change and that the excluded groups have some aspect that might interfere with the study parameters and goals. We also explained how we may expand some of the methods used in the Demonstration to other groups (e.g., triennial recertifications for elderly/disabled households). Others wanted the option to opt in or opt out of the Tiered Rent Reform Demonstration or wondered if bad credit might exclude them. We explained that an opt in/out choice was not possible and the tiered rent households would be determined by eligibility criteria and random assignment and credit scores would not impact eligibility. And while households cannot opt out of tiered rents, they can choose to exclude their personal information from the study. A staff commenter asked what would happen if a household that was previously excluded later became eligible. We explained that each current household only has one opportunity to join the study – at their recertification. So any changes to eligibility after that point would not allow them to be study eligible.

In determining which landlord incentives to include in the FY 2022 MTW Supplement, AMHA considered the feedback that was received. AMHA is requesting to conduct pre-qualifying unit inspections in zip codes of opportunity to address concerns over the wait time for HCV households to move into new units. Other comments suggested that damages are a common complaint in the HCV Program so a damage claim system could be useful and that AMHA could offer an incentive payment to landlords that are able to pass their first move-in inspection. Another commenter requested that pre-qualifying unit inspections be expanded to include accessible units. AMHA will consider adding additional landlord incentives and/or expanding the current incentives after enough time has elapsed to review the impact of the FY 2022 landlord incentives (pre-qualifying unit inspections and vacancy loss payments).

AMHA staff expressed concern over lead paint risks and having units vacant for pre-qualifying unit inspections. AMHA will require units to be vacant to conduct a pre-qualifying unit inspection and will share additional information with landlords regarding lead paint risks and fair housing to address discrimination concerns. In addition, staff were concerned that too many tenants may request a special inspection after move in and impact a landlord's "high performing" status. AMHA grants biennial inspections only to high performing landlords who have had less than 5 special inspections and no abatements in the last 2 years. AMHA will track the number of high performing landlords before and after

the implementation of the pre-qualifying unit inspections to see if the new policy has an unintended negative effect on landlords' performance status. AMHA will also take into consideration the suggestion by the MTW Advisory Committee to have landlords sign something brief that they intend to house an HCVP participant in the unit prior to completing the pre-qualifying unit inspection and incorporate it into the procedure if landlords are not utilizing the pre-qualifying inspections in the intended manner. AMHA will ensure inspectors are properly trained on the landlord incentives to maintain consistency in landlord and participant experiences.

AMHA accepted additional suggestions to consider for future Supplements from the public comment including: connecting households to additional services including supportive employment and financial resources, participant needs assessments, raising the allowable initial rent burden for HCV participants, and restricting portability. AMHA staff will review these suggestions for feasibility with our upcoming FY2023 Annual Plan and MTW Supplement.

Finally, some commenters asked questions regarding current AMHA policies that are unaffected by the MTW changes including homeownership and moving. AMHA relayed the current policies and gave contact information for which staff member to connect with if additional information was needed. AMHA staff brought these concerns to the MTW Advisory Committee for additional feedback and suggestions. They noted multiple barriers to a successful move that AMHA will continue to gather information on for future changes including inspection time, inspection requirements, rent offers, application fees, landlord required background checks, and security deposits. AMHA has already increased payment standards for 1 and 2 bedroom units and for all units in zip codes of opportunity, but will continue to review payment standard rates.

## **OH007 FY2022 Safe Harbor Public Comments**

### **1.a. & 1.b. Tiered Rent**

#### **2-16-22 MTW Safe Harbor & Agency Specific Meeting**

- Held virtually through zoom, presented powerpoint presentation
- 6 AMHA staff
- 13 HCVP or LIPH participants
- No comments received on Safe Harbor Waivers

#### **3-1-22 MTW Safe Harbor & Agency Specific Meeting**

- Held virtually through zoom, presented powerpoint presentation
- 3 AMHA staff
- 14 HCVP or LIPH participants
- No comments received on Safe Harbor Waivers

### **3.a. & 3.b. Alternative Reexamination Schedule for Households**

#### **2-16-22 MTW Safe Harbor & Agency Specific Meeting**

- Held virtually through zoom, presented powerpoint presentation
- 6 AMHA staff
- 13 HCVP or LIPH participants
- No comments received on Safe Harbor Waivers

#### **3-1-22 MTW Safe Harbor & Agency Specific Meeting**

- Held virtually through zoom, presented powerpoint presentation
- 3 AMHA staff
- 14 HCVP or LIPH participants
- No comments received on Safe Harbor Waivers

### **3.c. & 3.d. Self-Certification of Assets**

#### **2-16-22 MTW Safe Harbor & Agency Specific Meeting**

- Held virtually through zoom, presented powerpoint presentation
- 6 AMHA staff
- 13 HCVP or LIPH participants
- AMHA staff comment: Allowing the self-certification of assets for applicants will help so much with increasing efficiency. It takes so long for applications staff to collect and re-collect asset documentation. This change will be a big relief to them.

### **3-1-22 MTW Safe Harbor & Agency Specific Meeting**

- Held virtually through zoom, presented powerpoint presentation
- 3 AMHA staff
- 14 HCVP or LIPH participants
- No comments received on Safe Harbor Waivers

### **Description of how AMHA considered the above comments:**

AMHA agrees with the staff member that stated allowing applicants to self-certify their assets will increase efficiency.