

PHA Name : Brighton

PHA Code : CO019

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

PHA Program Type: Combined

MTW Cohort Number: MTW Flexibility for Smaller PHAs

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

For 2023 CO019 (BHA) is proposing some new activities as well as some revisions to previously approved activities. For statutory objective (1), BHA is revising its triennial reexamination schedule to allow fixed income families that flexibility but return families that include employment income to an annual reexamination schedule in a better attempt to capture accurate income calculations for subsidy. In addition, by permitting the implementation of payment standards at different effective dates, fixed income families on the triennial schedule will be better protected from being overly rent burdened without the necessity of administrative work. For objective (2), BHA is revising a previously approved income exclusion to better target young adult workers in assisted households and the creation of a new income exclusion is designed to help promote more effective incentive to disabled workers. BHA's continued service provision waiver is also being revised slightly to allow greater flexibility in assisting household seek and obtain employment. Statutory objective (3) is being addressed in the agency's submission to permit the use of HAP to support funding of the construction or redevelopment of housing units. Funding for projects is always a challenge and bringing this financial ability to the table may make the difference between units being built, redeveloped, or rehabbed, or the project being tabled due to lack of gap funding or other project financial obstacles. More units being made available will provide an enriched housing stock for low-income families.

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

1. Tenant Rent Policies	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
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)	Currently Implementing
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)	Currently Implementing
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)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
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)	Plan to Implement in the Submission Year
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Plan to Implement in the Submission Year
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Not Currently Implemented
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Currently Implementing
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Not Currently Implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Not Currently Implemented
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Currently Implementing
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
6. Short-Term Assistance	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	

Increase Elderly Age (PH & HCV)	Not Currently Implemented
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Currently Implementing
b. Increase PBV Project Cap (HCV)	Currently Implementing
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Currently Implementing
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)	Currently Implementing
10. Family Self-Sufficiency Program with MTW Flexibility	
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
11. MTW Self-Sufficiency Program	
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
12. Work Requirement	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
14. Moving on Policy	
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
15. Acquisition without Prior HUD Approval (PH)	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
16. Deconcentration of Poverty in Public Housing Policy (PH)	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
17. Local, Non-Traditional Activities	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Plan to Implement in the Submission Year

C. MTW Activities Plan that Brighton Plans to Implement in the Submission Year or Is Currently Implementing**1.j. - Alternative Utility Allowance (HCV)****Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

This activity consolidated the four schedules into just two. This has resulted in greater ease of use and understanding by participants. After the initial transition phase in implementing the consolidated schedules there is much less likeliness for administrative errors. The schedules retain the bedroom count and utility type factors. The implementation of the simplified schedules has resulted in increase efficiency of administrative burden and greater understanding and use by participants.

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

Cost effectiveness

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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.

Since the schedules are based on averages there is little fiscal impact from this activity. However, the reduction in administrative errors has more than offset any increase in this activities implementation.

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

No

Please describe the alternative method of calculating the utility allowances. Please explain how the method of calculating utility allowances is different from the standard method and what objective the MTW agency aims to achieve by using this alternative method.

The calculations are the average of the three unit types for families (single family home, duplex, and multi-family). The senior utility allowances are site specific from high energy efficiency projects and are based on average annual usage studies adjusted for annual anticipated cost adjustment factors.

The agency will review its schedule of utility allowances each year and revise its allowance for a utility category if there has been a change of 10 percent or more of the cost from the prior year. The agency will maintain information supporting its annual review of utility allowances and any revisions made in its utility allowance schedule.

The agency will not include items in the utility schedule that are excluded under HUD regulations.

1.n. - Utility Reimbursements (HCV)**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

This waiver ended utility reimbursements for families. By eliminating URPs this created a minimum level of self-sufficiency not captured in current regulations. This waiver only affects a household when the utility allowance is greater that the total tenant payment.

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

Cost effectiveness; Self-sufficiency

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

Decreased expenditures

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

The MTW activity applies 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.

The elimination of URPs has freed up an estimated \$12,000 in annual HAP expenditures. That much is enough to support the issuance of at least one additional voucher, possibly more.

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

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

The PHA proposes to revise a previously approved waiver: a partial income exclusion for non-head of household (or spouse or cohead) adult members between the ages of 18 and 24 (previously approved as 18 and 30) where only 75% of their earned income from employment would be used when calculating family share. Historically, this agency has seen adult children cease employment once their income is captured in family share calculations. This is sometimes done since the adult child may drive family share more than the HOH and the household becomes destabilized as the individual members may not contribute at the rate calculated by the PHA. This leaves the HOH oftentimes with the choice of being unable to collect the increased rent share from the adult member, or forcing the adult member to cease employment to return the family share back to the prior lower level. The partial exclusion preserved the young adults desire to work and build job history and financial resources for establishing an independent unassisted household while still permitting the PHA to capture the majority of the new income when calculating family share. The revision of the age range previously approved is to bring this partial exclusion in line with the student rule age range. This should help reduce administrative errors in applying this non-standard exclusion. (The student rule age range is used but there is no connection between this income exclusion and student income exclusion - a student would still receive the the income exclusion under current regulation, all excluded except for \$480.)

In addition to the above revision to a previously approved activity, the PHA is proposing to create an income exclusion for family members receiving SSI and are employed. This would replace EID as it currently exists for those household members. The PHA is proposing to excluded 50% of earned employment income from any family member that is receiving SSI. This activity is designed to support self-sufficiency for disabled recipients of SSI that are earning wages in addition to SSI or seek to transition back to full employment status.

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

Self-sufficiency

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

Increased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Disabled families (to the extent those families are not exempt via a reasonable accommodation); Other – another specifically defined target population or populations.

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

The target population for the first described activity above already in effect is non-head of household (or spouse or cohead) adult members between the ages of 18 and 24.

The second described activity is permitted under HUD clarification that PHAs have been approved to exclude income from assets for elderly and disabled. This allows the PHA to apply its overall activity (the second described activity) to all program participants.

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

The MTW activity applies to all tenant-based units

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

The PHA has seen decreased HAP expenses as the young adults targeted by the already in-effect waiver has seen them continue employment. However, it was noted that the PHA is only capturing 75% of their income so the shortfall of the 25% is covered by increased HAP expenses if normal calculation rules were used. Although difficult to fully assess, the PHA would have previously expected some of the young adult wage earners to have ceased employment without this waiver.

For the SSI recipient while earning wages exclusion, this is the first year it would be implemented.

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

No

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

BHA is proposing modifications to its previously adopted activity – exclusion of 25% of earned income by non-head of household (HOH) adult family members. This revision will reduce the applicable age to non-HOH are able to receive this benefit. The 25% income exclusion shall be revised to only be applicable between the ages of 18 to 26. The already approved version of this waiver is available to applicable persons between the ages of 18 and 30. All other provisions previously approved shall remain unchanged.

Secondly, the PHA is requesting the option to apply to change the Earned Income Disallowance (EID) to be a flat 50% exclusion for individuals receiving SSI payments with no lifetime limit on the benefit. For an individual receiving SSI payments, BHA would apply a 50% exclusion to any income earned through wages by the family member. This benefit would replace the current EID income exclusion that could otherwise be available to the family member. Individuals who are disabled but not receiving SSI would be unaffected by this activity. For family members covered by multiple MTW

Alternative Income Exclusion waivers adopted by BHA, the family would only receive the single, most generous benefit. (i.e., benefits do not stack – if the family could receive both a 50% exclusion under one waiver and a 25% under another waiver, only the 50% would apply.)

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

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

The PHA implementing the option to apply the current year payment standard at any time after the effective date of the new amount when the payment standard increases. Applying the new increased payment standard after the effective date, instead of at the household's first regular reexamination after the effective date of the new payment standard, will reduce the number of households who may be rent burdened otherwise. This MTW flexibility is important due to BHA's adoption of triennial reexaminations of elderly and disabled households. In addition, without this flexibility the family may elect to move to a different unit to secure the increased payment standard. With this flexibility they can remain in their current unit.

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

Self-sufficiency; Housing choice

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

Increased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

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

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

The MTW activity applies to all tenant-based units

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

First year of implementation

Does this MTW activity require a hardship policy?

No

No document is attached.

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

No

Does the MTW activity require an impact analysis?

No

No document is attached.

Please explain the payment standards by FMR:

The payment standards will be set according to normal policy - between 90% and 110% of FMR. This activity only affects when the payment standard is implemented. If an elderly or disabled household is subject to a contract rent increase that would put the family share above 30%, the family would receive the benefit of the normally increasing payment standard during an interim adjustment instead of at the family's next normally occurring triennial reexamination. The interim adjustment which applies the increased payment standard would occur at the same time the contract rent increase goes

into effect.

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

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

The PHA operates in a smaller jurisdiction and getting a qualified third-party to review and approve the few numbers of properties the PHA would need is not cost or time effective. In addition, the PHA routinely underprices their directly owned properties to remain affordable. The overwhelming majority of units at PHA-controlled properties are either LIHTC and not subject to rent reasonableness or RAD and are simply indexed to OCAF.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

The PHA has saved time and expense under the activity. There is no longer the cost of securing a third-party and the lease-up and rent increase approval process time has been reduced significantly.

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

No

Please explain or upload a description of the quality assurance method.

The PHA will employ a third-party to review a sample (25%) of the required annual rent reasonableness determinations. If the review reveals a non-reasonable rate greater than 5% of the sample, the PHA shall have the third-party review 100%

of the rent determinations to ensure rent reasonableness is true and accurate.

No document is attached.

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

The PHA uses software from a nationally known and recognized third-party provider (Nelrod). The provider uses available market data to generate a set of comparable units for each rent reasonableness determination. The guidelines established with the software provider conform to the HUD requirements outlined in 24 CFR 982.305 and 24 CFR 982.507.

No document is attached.

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

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

In an effort to reduce administrative burden on the families and PHA staff, elderly and disabled households moved to a recertification schedule of every three years. Changes in these households is usually limited to annual Social Security COLA increase which are typically not cost or time effective to capture on an annual basis.

Notwithstanding the expanded ability to file more than one interim per year under the current PHA Administrative Plan, the agency shall not restrict MTW safe harbor and will allow at least one interim adjustment per year at the request of the household, if the household income has decreased 10% or more.

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

Cost effectiveness

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

Decreased revenue

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

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

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

The MTW activity applies to all tenant-based units

Does this MTW activity require a hardship policy?

Yes

This document is attached.

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

No

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?
No
How many hardship requests have been received associated with this activity in the past year?
No hardship were requested in the most recent fiscal year.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?
No
Does the MTW activity require an impact analysis?
No No document is attached.
What is the recertification schedule?
Once every three years
How many interim recertifications per year may a household request?
2 or more
Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.
The PHA will conduct an interim reexamination of the household at the family's request, if the household adds or removes any household members. The triennial reexamination schedule shall only apply to households who consists of only entirely elderly or disabled members who are on a fixed income or derive income from fully excluded sources under current regulation. In addition, the PHA allows at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more.

3.d. - Self-Certification of Assets (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative
Families self-certify assets under \$25,000 on an on-going basis. More than 95% of the families served on the program have less than \$5,000 in assets and it is extremely rare to have a household with greater that \$25,000 in assets. The families and PHA staff used to spend considerable time and effort in certifying those assets which would only in exceptionally rare cases generate more than \$100/year in income. PHA staff time and resources are better spent on other functions than verifying inconsequential assets.
Which of the MTW statutory objectives does this MTW activity serve?
Cost effectiveness
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.
Decreased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

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

It is estimated that the fiscal impact of this activity is a decreased in captured income of \$200 program-wide. This loss of captured income is more than offset by the savings in staff time and expense.

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

No

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

\$25,000.

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

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

The PHA is authorized to conduct its own HQS inspections for units, owned, controlled, or managed by the PHA. This agency is a smaller jurisdiction and securing a qualified, reliable third-party inspection proved to be costly or time consuming to execute. Without a reliable third-party inspection, families faced delays in occupancy.

The family can still request an interim inspection.

HQS standards have not been altered as found at 24 CFR 982.401.

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

Cost effectiveness; Housing choice

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

Family's no longer face a delay in getting an inspection and can lease-up or begin assistance faster.

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

No

Please explain or upload the description of the quality assurance method:

Following will explain the quality assurance method

The PHA utilizes a third-party inspector to perform the required SEMAP HQS QC inspections. Failed HQS QC inspections

of greater than 10% would result in all PHA-owned, managed, or controlled units being re-inspected. The family can also request a third-party inspection in case of complaint or interim inspections.

No document is attached.

9.a. - Increase PBV Program Cap (HCV)

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

Since the local rental market is tight, the PHA was previously authorized to project-base up to 50% (of the lower of either the total authorized units or annual budget authority). This activity has not been utilized but remains an option if success rates for voucher holders falls and jeopardizes the overall utilization of the HCV program.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

Since no new PBVs were authorized in the prior year, there is no fiscal impact at this time.

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

No

What percentage of total authorized HCV units will be authorized for project-basing?

50.00%

9.b. - Increase PBV Project Cap (HCV)

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

Increasing the PBV project cap provides another tool to develop or support affordable housing options. Although this activity was previously approved, it has not been utilized at this point.

This agency remains subject to Notice PIH 2013-27 where applicable, or successor.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

As no new PBV were implemented there is no fiscal impact.

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

No

9.c. - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)

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

Historically, the PHA has had extremely limited responses to the PBV Selection Process. This activity was previously approved and allows the PHA to seek out qualified, proven partners to develop PBV projects. Having a reliable, knowledgeable developer increase the likelihood of projects coming to fruition.

A subsidy layering review must be conducted.

The agency must complete site selection requirements.

HQS inspections must be performed by an independent entity according to 24 CFR 983.59(b) or 24 CFR 983.103(f).

The agency is subject to Notice PIH 2013-27 where applicable, or successor.

Property must be owned by a single-asset entity of the agency, see Notice PIH 2017-21.

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

Housing choice

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

As no PBVs were awarded in the prior year, there was no fiscal impact.

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

No

9.h. - Limit Portability for PBV Units (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW

activity contributes to a larger initiative

The PHA wants to encourage the establishment of strong community ties to the jurisdiction. Vested interest in the community helps to create longer-term stability through engagement of schools, employment, religious, community, or civic participation. Limiting portability by delaying choice mobility until two years have elapsed since admission helps strengthen those ties between the participant and the community.

The agency has a clear and uniform policy in place to address how move requests are received and how they are approved/denied for PBV households.

Participants still retain the ability to request a tenant-based voucher for reasonable accommodation according to existing rules.

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

Cost effectiveness; Housing choice

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

Neutral (no cost implications)

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

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

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

New admissions (i.e., applicants) only

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

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

This only applies to non-resident admissions of PBV families.

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

The MTW activity applies to all properties with project-based vouchers

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

There were no non-resident admissions to the PBV program in the last year so this activity has had no fiscal or other impact.

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

No

17.b. - Service Provision

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

The PHA was previously approved to allocate \$145,000 of annual HAP funding to support service programs. This year the PHA is requesting that instead of a fixed amount of \$145,000, the PHA be permitted to be flexible each year depending on program needs and be authorized to allocate up to 10% of its HAP budget on service provisions. However, the PHA will still not spend more than 10% of its annual PHA budget on all local non-traditional activities authorized by its MTW flexibilities.

Activities supported by the service provision include:

Housing navigation which focuses on supporting families with housing needs and expanded services including homeownership navigation. These services address the housing continuum to move the local community towards long-term housing stabilization.

Career and College Launch (CCL) which involves community partnerships to assist high school and middle school students to investigate financial aid, explore post secondary school and program options, and internship opportunities. This program utilizes multiple facets and community partners giving the students more options as they consider their post high school steps. This is a long-running program and has been able to expand with support from the MTW flexibility provided.

Food assistance as the PHA delivers commodities to older families in need at the community's senior independent living projects. The PHA partners with local and regional food banks to seek further opportunities to expand enrollment in the partner programs and increase community impact on addressing food needs among low-income vulnerable populations.

Case management for Tenant-based Rental Assistance programs is another priority for the PHA. The agency operates a TBRA program using county funding for subsidy assistance but many of those participants are also applicants to the local HCV program. Services include housing navigation and successful transition off of assisted housing thereby lessening the demand for HCV assistance. The PHA also provides linkage services to other agencies who might be able to assist while families remain on the HCV waiting list. The linkage services are also available to all HCV participant families.

Youth enrichment program which is designed to foster social and literacy skills for children in low-income populations and give them tools to decrease generational obstacles. The program provides a safe, positive, and stimulating environment to explore learning and experience academic and personal success. This includes opportunities like dance, music, sports, and art. We have seen an increase in the number of children participating in the program and their abilities have grown while being a part of it.

These initiatives build upon the agency's normal HCV program to provide more robust services to a wider low-income population.

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

Self-sufficiency; Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

The PHA utilized \$145,000 of HAP to support the programs. That funding allow the PHA to continue services that would have otherwise been discontinued or drastically scaled back.

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

No

What types of services is the MTW agency providing?

Housing search and navigation. Preparatory services for students for post-high school opportunities. Food assistance. Case management. Youth enrichment program.

The agency will not spend more than 10% of its HAP budget on local, non-traditional activities.

Families receiving housing or services through local, non-traditional activities must meet the HUD definition of low-income.

The agency is subject to Notice PIH 2011-45 or any successor notice and/or guidance.

The agency will comply with Section 30 of the 1937 Housing Act.

Any MTW funding awarded to a third-party provider must be competitively bid.

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

436

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

The MTW activity applies to all units/properties

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

Yes

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

1,089

17.c. - Housing Development Programs**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

The PHA plans to use MTW Funding to acquire, renovate and/or build affordable units for low-income families that are not public housing units. Eligible activities may include: gap financing for non-PHA development of affordable housing, development of project-based voucher units or tax credits partnerships.

The PHA has identified the projects known as RAD phase II as well as Hughes Station Apartments as projects which may receive funding from this flexibility. These project are scheduled for renovations and to provide affordable units for low-income families.

The agency will not spend more than 10% of its HAP budget on local, non-traditional activities.

Families receiving housing or services through local, non-traditional activities will meet the HUD definition of low-income.

The agency is subject to Notice PIH 2011-45 or any successor notice and/or guidance.

Agency will comply with section 30 of the 1937 Housing Act.

Any MTW Funding awarded to a third-party provider will be competitively bid.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

This is a new activity for this year.

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

No

Table 17.c.1 - Housing Development Programs that the MTW Agency plans to commit Funds to in Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Brighton RAD II	Rehabilitation	Gap financing	13.00	13.00	0.00	0.00	0.00	13.00
Hughes Station Apartments	Rehabilitation	Gap financing	120.00	120.00	0.00	51.00	18.00	51.00

Housing Development Programs that the MTW Agency plans to spend funds on in the Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Brighton RAD II	Rehabilitation	Gap financing	13.00	13.00	0.00	0.00	0.00	13.00
Hughes Station Apartments	Rehabilitation	Gap financing	120.00	120.00	0.00	51.00	18.00	51.00

Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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D.	Safe Harbor Waivers.
D.1	<p>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</p> <p>No Safe Harbor Waivers are being requested.</p>

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

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
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G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
	80%-50% Area Median Income	
	49%-30% Area Median Income	
	Below 30% Area Median Income	
	Total Local, Non-Traditional Households	0

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

G.2	Establishing Reasonable Rent Policy.

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

G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.	
	Occupied Number of Local, Non-Traditional units by

Family Size:	Household Size
1 Person	
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.
	No known evaluations.



22 South 4th Avenue, Suite 202
Brighton, Colorado 80601

AGENCY SPECIFIC WAIVERS

HUD Approval Requested

**2023-1 IMPLEMENTATION OF PAYMENT STANDARDS AT EFFECTIVE DATE
ELDERLY AND DISABLED**

STATUS: PROPOSED

a) Description of Activity

CO019 is requesting the option to apply the current year payment standard at any time after the effective date of the new amount when the payment standard increases. Applying the new increased payment standard after the effective date, instead of at the household's first regular reexamination after the effective date of the new payment standard, will reduce the number of households who may be rent burdened otherwise. This MTW flexibility is important due to BHA's adoption of triennial reexaminations of elderly and disabled households.

Regulation Waived

24 CFR 982.505(c)(4) which states in part that "...the increased payment standard amount shall be used to calculate the monthly housing assistance payment for the family beginning at the effective date of the family's first regular reexamination on or after the effective date of the increase in the payment standard."

b) Statutory Objective

This activity will promote self-sufficiency and housing choice among elderly and disabled households. Without this waiver elderly and disabled households could face a choice of accepting a rent increase without a corresponding increase in their payment standard which could leave the family overly rent burdened. Alternatively, to avoid being overly rent burdened the family could be forced to move instead to receive the increased payment standard at a new unit.

- c) This activity would apply to all elderly and disabled household who are on an MTW-approved triennial regular reexamination schedule.

- d) Cost Implications
This activity will result in higher future HAP expenditures. However, these are unavoidable future HAP expenditures that will occur regardless of this activity or not. The largest driver in these future HAP expenditures are rent increases that will occur in the interim years for households that recertify triennially. Without this activity, the elderly and disabled households would be likely be unduly rent burden in the interim years the family is waiting for their next regularly scheduled reexamination.

- e) The PHA would implement this activity upon HUD's approval of the agency specific waiver.

- f) Impact Analysis
The impact of this activity will see the rent burdens of affected families reduced. Without this waiver, triennially recertifying elderly and disabled families would only have their modest fixed income annual cost-of-living increase with which to offset the expected rent increases that would come in the non-regular reexamination years. Even with the ability to request an interim reexamination, the PHA is bound to 24 CFR 982.505(c)(4) which would not permit the application of the increased payment standard until the next regularly scheduled reexamination which could be two or more years away. The short term reduced cost to the PHA in the form of the families paying for the rent increases instead of increased HAP, is offset by the risk to elderly and disabled families not being able to keep pace with local market forces driving rent increases up faster that cost of living adjustments.

- g) Hardship Policy
As this activity would only reduce the rent burden placed upon the household, there is no need for a hardship policy.

- (h) There was no public comment received regarding this waiver either prior to or at the public hearing.

ATTACHMENT 2
Moving to Work Certifications of Compliance

CERTIFICATIONS OF COMPLIANCE

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING

Certifications of Compliance with HUD and Federal Requirements and Regulations:
Board Resolution to Accompany Application to the Moving to Work Demonstration Program

Acting on behalf of the Board of Commissioners of the applicant public housing agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the application to the Moving to Work Demonstration Program for the PHA and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the application and implementation thereof:

- (1) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure at least 75% of families assisted are very low-income as defined in Section 3(b)(2) of the 1937 Act throughout the PHA's participation in the MTW Demonstration Program.
- (2) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in establishing a reasonable rent policy that is designed to encourage employment and self-sufficiency.
- (3) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to assist substantially the same total number of eligible low-income families as would have been served absent MTW throughout the PHA's participation in the MTW Demonstration Program.
- (4) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to maintain a comparable mix of families (by family size) as would have been provided had the funds not been used under the MTW Demonstration Program throughout the PHA's participation in the MTW Demonstration Program.
- (5) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure housing assisted under the MTW Demonstration Program meets housing quality standards established or approved by the Secretary throughout the PHA's participation in the MTW Demonstration Program.
- (6) The PHA published a notice that a hearing would be held, that the application and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the application by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the application and invited public comment.
- (7) The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the application by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the application.
- (8) The PHA certifies that the Board of Commissioners 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).
- (9) The PHA must certify that it will carry out its application in conformity with Title VI of the Civil Rights Act of 1964 (42 USC 2000d-2000d-4), the Fair Housing Act (42 USC 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 USC 794), and title II of the Americans with Disabilities Act of 1990 (42 USC 12101 et seq.), regulations implementing these authorities, and other applicable Federal, State, and local civil rights law and that it will affirmatively further fair housing, which means that

compliance with program requirements.

- (23) The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (24) The PHA will comply with the requirements of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Rewards at 2 CFR Part 200.
- (25) The application and all attachments are available at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Housing Authority of the City of Brighton

CO019

PHA NAME

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).

Debra Bristol

Executive Director

NAME OF AUTHORIZED OFFICIAL*

TITLE



01/04/2023

SIGNATURE

DATE

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

RESOLUTION NUMBER 23-05-01

A RESOLUTION OF THE COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF BRIGHTON, COLORADO, APPROVING THE HOUSING AUTHORITY'S SUBMISSION OF THE 2023 MOVING TO WORK (MTW) ANNUAL PLAN SUPPLEMENT AND AUTHORIZING THE EXECUTIVE DIRECTOR OF THE HOUSING AUTHORITY TO EXECUTE ANY DOCUMENTS REQUIRED BY THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD) TO SUBMIT THE 2023 MTW SUPPLEMENT TO THE PUBLIC HOUSING AUTHORITY ANNUAL PLAN.

WHEREAS, the undersigned, representing all of the Commissioners of the Housing Authority of the City of Brighton, Colorado (aka the Brighton Housing Authority), a body corporate and politic created and existing under the Housing Authorities Law of the State of Colorado (the "Authority"), do hereby take the actions below set forth as follows:

WHEREAS, the U.S. Department of Housing and Urban Development (HUD) has designated the Brighton Housing Authority as a Moving to Work (MTW) agency;

WHEREAS, to implement the Brighton Housing Authority's waivers to the Housing Choice Voucher (HCV) program authorized under the MTW Demonstration Expansion program, the Executive Director must submit the 2023 MTW Supplement to the Annual Plan;


WHEREAS, the draft 2023 MTW Annual Plan Supplement was made available and shared with the Board of Commissioners on May 9th, and the Board of Commissioners has examined and approved the same as to form and content.

NOW, THEREFORE, BE IT RESOLVED, by the Board of Commissioners of the Housing Authority of the City of Brighton as follows:

1. The Board of Commissioners approves the 2023 MTW Annual Plan Supplement and required associated documents.
2. The Board of Commissioners authorizes the Authority's Executive Director to sign and submit to HUD the necessary documents for the 2023 MTW Annual Plan Supplement.

RESOLVED AND ADOPTED this 11 day of May 2023 by the Commissioners of the Brighton Housing Authority.

ATTEST:



Debra S. Bristol, Secretary

**HOUSING AUTHORITY FOR THE
CITY OF BRIGHTON, COLORADO**



Michelle Miller, Chairperson



**22 South 4th Avenue, Suite 202
Brighton, Colorado 80601
303.655.2160 office
303.655.2164 fax**

April 6, 2023

BRIGHTON HOUSING AUTHORITY MOVING TO WORK PLAN PUBLIC HEARING MINUTES

Public Hearing held at 3:00 PM:

- The Moving to Work (MTW) Plan was posted on the PHA website and was available for review by the public since February 16, 2023.
- Notice of this public hearing was posted on the PHA website and published in the local paper of record; the newspaper notice ran on February 16, 2023, February 23, 2023, March 2, 2023, March 9, 2023, March 16, 2023, March 23, 2023, and March 30, 2023.
- No phone calls or any other type of correspondence regarding the public hearing or MTW plan was received.
- No resident/participants attended the public hearing.
- No other comments were received.

Staff in attendance:

- Andrew W. Dall, Deputy Director
- Cinthya Behanna, Housing Programs Manager



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BRIGHTON HOUSING AUTHORITY ANALYSIS OF PUBLIC COMMENTS

As no member of the public or participant attended the public hearing or submitted any written or verbal comment prior to the public hearing on the MTW Plan, there was little information to be incorporated into the plan.

The PHA has also not received any comments from MTW activities previously implemented.



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HARDSHIP POLICY FOR ALTERNATIVE REEXAMINATION SCHEDULE FOR HOUSEHOLDS

(MTW 3.b)

A disabled or elderly family impacted by this waiver may still request a family-initiated interim reexamination of family income at any time between annual (or triennial) reexaminations in accordance with the existing PHA Administrative Plan. The PHA Administrative Plan does not place a limit on the number of family-initiated interim reexaminations that may be requested per year.

In addition, the agency will allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more.