

PHA Name : Brockton Housing Authority

PHA Code : MA024

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

PHA Program Type: Combined

MTW Cohort Number: Landlord Incentives

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The Brockton Housing Authority will continue to implement the waivers obtained for FY2023 to increase housing opportunity. For FY 2024 the Brockton Housing Authority plans to use its financial flexibility to develop/redevelop affordable housing. The Brockton Housing Authority plans to use waiver 17.c to use financial flexibility to help redevelop some obsolete public housing for which it has Section 18 approval at the Campello High Rise. These 398 deeply affordable units are greatly needed in the Brockton area. Currently there is a dearth of housing of any kind in the Brockton area. We also plan to implement PBV waivers 9. c, & d to project base the TPV vouchers awarded with the Section 18 approval to the new development. All of our plans so far are to help our participants and residents find clean, safe, sanitary, and affordable housing by either increasing or maintaining the supply of affordable housing and by implementing waivers that make it easier for voucher holders to find a suitable unit.. We also plan to implement 4.c Other Landlord Incentives by implementing a security deposit program for new voucher holders for their first lease up. Many of our new voucher holders have no credit history or are coming from homelessness and are unable to compete with a private pay tenant who can afford a security deposit. We expect that this plan will increase our success rate a by encouraging landlords to rent to our voucher holders.

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)	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)	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)	Currently Implementing
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Currently Implementing
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)	Not Currently Implemented
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Not Currently Implemented
b. Alternative Reexamination Schedule for Households (HCV)	Not Currently Implemented
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Not Currently Implemented
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Currently Implementing
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Plan to Implement in the Submission Year
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)	Not Currently Implemented
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)	Plan to Implement in the Submission Year
b. Increase PBV Project Cap (HCV)	Plan to Implement in the Submission Year
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
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	Not Currently Implemented

C. MTW Activities Plan that Brockton Housing Authority Plans to Implement in the Submission Year or Is Currently Implementing

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 Brockton Housing Authority plans to implement the following income exclusion. For families who voluntarily leave TANF (welfare), while still eligible, the Brockton Housing Authority will exclude the earned income from employment that is greater than the TANF payment, for one year. The goal is to incentivize families to leave TANF and become employed. This MTW activity is intended to meet the statutory requirement of establishing a reasonable rent policy designed to encourage employment and self-sufficiency. This MTW activity will not apply to the elderly or disabled.

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

Self-sufficiency

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.

There has been little participation yet, due to the lag between approval and then amending the Section 8 Admin plan.

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?

There will be an income exclusion

2.a. - Payment Standards- Small Area 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

Brockton area voucher holders will have a greater choice of apartments. The Rental Assistance staff has recognized that voucher holders in Brockton are not able to rent in various developments because the rent exceeds the current payment standards. Currently, voucher holders are forced into less desirable sections of the city or move to adjacent towns that are in another FMR area and has a higher payment standard. Being forced to move to adjacent towns causes a disruption to the family being away from the supports of other family members, current schools, friends, and community support. Brockton has a n excellent public transportation system and extensive shopping that are lacking in the surrounding towns. There are numerous reported cases of voucher holders taking an apartment in surrounding towns in order to not lose the voucher and looking to move back to Brockton at the end of the first year. In the past 12 months, we have had 11% of issued vouchers returned as the family could not find a place to rent.

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 to all family types

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

The MTW activity applies to all 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.

There has not been enough time to evaluate the effects between the lag of approval and the amendment to the Section 8 Admin Plan and the Staff calculating the reasonableness of each payment standard to be presented to the Board of

Commissioners. FY 24 should provide the data we need to evaluate the effects.

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?

Yes

This document is attached.

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

No

Please explain the payment standards by ZIP code or "grouped" ZIP codes:

Zip codes in the Brockton HUD Metro FMR area

4.a. - Vacancy Loss (HCV-Tenant-based Assistance)
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>The Brockton Housing Authority proposes to pay a vacancy payment to a Section 8 landlord who tenants to another Section 8 tenant at the end of the tenancy of the first Section 8 tenant. There will be a cap of one month, the unit must have actually been vacant and will be paid upon signing the new HAP agreement.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Housing choice</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Increased expenditures</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>There have been no requests for vacancy payments to date.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?)</p> <p>To all units</p>
<p>What is the maximum payment that can be made to a landlord under this policy?</p> <p>\$one months rent</p>
<p>How many payments were issued under this policy in the most recently completed PHA fiscal year?</p> <p>0</p>
<p>What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?</p> <p>\$0</p>

4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>The PHA plans to pay the security deposit for new voucher holders who need a security deposit. The goal is to allow voucher holders to compete with private pay renters and thereby increase our success rate. This activity will fit into the larger initiative of giving our voucher holders more choice by opening up units that require a security deposit.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Housing choice</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p>

Increased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?
The MTW activity applies only to a subset or subsets of assisted households
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?
New admissions (i.e., applicants) only
Does the MTW activity apply to all family types or only to selected family types?
The MTW activity applies to all family types
Does the MTW activity apply to all 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.
Being implemented this year
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?
No
Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?)
To all units
What is the maximum payment that can be made to a landlord under this policy?
\$one month
How many payments were issued under this policy in the most recently completed PHA fiscal year?
0
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?
\$0

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
This activity will increase the PHA's PBV cap and allow the PHA to project base the TPV's received with its Section 18 Demo/Dispo approval in order to help secure financing for the reconstruction of 398 deeply affordable units.
Which of the MTW statutory objectives does this MTW activity serve?
Housing choice
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? New admissions and currently assisted households
Does the MTW activity apply to all family types or only to selected family types? The MTW activity applies to all family types
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? The MTW activity applies to all properties with project-based vouchers
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. To be implemented
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? 40.00%

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 This activity will allow the PHA to project base all of the units being reconstructed in its Campello High rise Section 18 redevelopment
Which of the MTW statutory objectives does this MTW activity serve? Housing choice
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Neutral (no cost implications)
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies 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. Not implemented yet
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No

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

This activity is to is redevelop the Brockton Housing Authority's Campello High Rise. There are currently two 10-story high-rise buildings occupied by federally-assisted elderly and disabled residents that Brockton Housing Authority operates and manages. The existing buildings were designed for the southwest of the United States and have been plagued from the beginning by water infiltration and inadequate insulation from the cold. One of the high-rise buildings sits in the flood plain of the Salisbury River, leading to flooding onsite. These original design flaws, combined with the age of the buildings, have led to wide scale system failures. An in-depth physical needs analysis has determined the buildings are obsolete and are not economically feasible to rehabilitate.

The Residences uses Project-Based Vouchers acquired through HUD's Section 18 disposition program to assist with funding the site's redevelopment allowing the preservation of deeply subsidized and affordable units for elderly and disabled residents for the long term. The Residences is designed to be climate resilient and sustainable thus reducing the project's carbon footprint. The Residences is financeable using project based operating subsidies, 4% Low-Income Housing Tax Credits (LIHTC), tax-exempt bond financing, and various other grants and loans. To satisfy LIHTC requirements, the BHA will ground lease the property to a limited liability company which will be 99.99% owned by a tax credit investor.

The redevelopment project will replace all existing units and create at least 396 new one-bedroom and 2 two-bedroom apartments. Many of the residents are aging in place and the existing facilities pose hazards and inefficiencies to the residents given the building's poor condition, structural deficiencies, undersized units, and failing building systems including non-existent ventilation. The site will be completely redesigned to transform the imposing high rises into a functional and livable campus, and to remove the residential units from the flood zone. The work will include new drives, parking areas, site lighting, walkways, fencing, landscaping and open spaces.

The redevelopment will be completed in multiple phases. There will be construction of three new mid-rise buildings and demolition of the existing buildings. Our plan is to construct the new buildings while leaving the residents in place, move the residents, and then demolish the existing buildings.

The redevelopment contributes to the City of Brockton's master plan and aligns with efforts to promote economic development in the Campello Neighborhood. The redevelopment will spur job growth as the demand for labor will be consistent throughout this multi-phased project. The project will be the catalyst for redevelopment in the Campello Neighborhood, which will set the precedent for developing high quality low-income and affordable housing in the City of Brockton and surrounding area. The physical improvements of the Campello Neighborhood will integrate affordable housing and increased pedestrian access to and from public transportation within the community. This project will catalyze activity in the local economy through construction and local spending.

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 and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

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

Does the MTW activity apply to all public housing developments?

The MTW activity applies to specific developments

Which developments participate in the MTW activity?
Campello High Rise

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.
New implementation

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
Campello High Rise	New construction	GAP Financing, Tax Credit partner	398.00	398.00	0.00	98.00	300.00	0.00

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
Campello High Rise	New Construction	Pre construction	398.00	0.00	0.00	98.00	300.00	0.00

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
Campello High Rise	New Construction	Pre Construction Costs	398.00	398.00	0.00	98.00	300.00	0.00

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
	New Construction	Gap Financing, Tac Credit Partner	398.00	398.00	0.00	98.00	300.00	0.00

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
2022	\$9,537,532		\$0	
2023	\$8,106,517	\$6,732,267	\$1,374,250	

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	0
	49%-30% Area Median Income	0
	Below 30% Area Median Income	0
	Total Local, Non-Traditional Households	0

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

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

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

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

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

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

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

H.	Public Comment
	Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.
	No additional public hearing was held for an Agency-Specific Waiver and/or Safe Harbor waiver

I.	Evaluations.
	No known evaluations.