

PHA Name : Dover

PHA Code : NH003

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2023

PHA Program Type: Combined

MTW Cohort Number: MTW Flexibility for Smaller PHAs

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

Moving to Work (MTW) is a program that offers Public Housing Authorities (PHAs) the flexibility to design and test various approaches for providing and administering housing assistance. "Waivers" can be used to eliminate or change requirements that restrict progress for participants and for the Housing Authority. Funding can be used where it would be most beneficial. MTW has three primary goals:

1. Cost effectiveness: To reduce costs, Staff's time will be evaluated for opportunities to streamline procedures. Staff will be able to focus on preventing errors and focusing on clients instead of paperwork. Money that can be saved in one area can be used in another since funds are not restricted to one purpose.
2. Self-sufficiency: DHA plans stabilize rent for an extended time, even if a family earns more money. For example, without a MTW waiver, when a family's income increases, reporting change of income is required, and then rent is increased. The DHA is encouraging employment and seeking increased income by reducing rent changes to be (in most cases) only once every other year. This will help families budget and be able to keep extra income for saving or for daily living expenses.
3. Housing choices: By increasing housing stock, partnering with developers and landlords to encourage affordable housing in the community, more housing choices will be made available. We also plan to build on our success of helping families move out of assisted housing to other areas and to become homeowners. Raising Payment Standards will make renting more obtainable in the Dover area.

Short Term Goals:

We want to give back time and provide opportunities to the families we serve. We want to reduce red tape and support families to get on their feet or stay on their feet and not feel trapped. We want the participants to "get ahead" and feel in control of where and how they live.

Short term goals involve reducing paperwork for participants and staff. There are times the burden of regulations and paperwork get in the way of meaningful progress. In 2022, Dover Housing Authority applied for and was granted waivers for "Rent Reform". By changing reporting and documenting requirements, time and resources can be refocused in ways that benefit the families being served but without compromising the integrity of the rental assistance program.

The first Waivers were approved, including the Safe Harbor Waivers late in 2022. The Waiver will be implemented in 2023.

- Alternative Examination Schedules for Public Housing. All new and current participants certifications will occur every 2 years instead of every year. Exceptions to this Waiver are explained in the Supplement.
- Income changes do not have to be reported between reexaminations. Exceptions to this Waiver are explained in the Supplement.
- Assets under \$50,000 may be self-certified.
- All income from assets is excluded from rent calculation.
- Family Self-sufficiency graduation requirement to be off TANF for 12 mos. has been eliminated. Employment by any household member will satisfy the work requirement for household to graduate. Increased accountability for program has been added. Requirements are detailed in the Supplement.

To further the goal of helping families and individuals become more self-sufficient, DHA has 40 Mainstream Vouchers and 4 Foster Youth to Independence (FYI) Vouchers available. The Housing Authority can extend FYI Vouchers by 2 years if the family participates in the Family Self-Sufficiency Program. This is in accordance with HUD Notice 87 FR 3570.

New Activities pending approval for 2023:

The Rent Reform and FSS Contract changes focused on Self-Sufficiency and Time Cost savings. The DHA seeks to add a Waiver to increase Housing Choices.

The Waiver request would raise the Rental Payment Standards to 120% of the FMR. Rental payments standards, set on a federal level, although regional, do not reflect the inflated rental costs in Dover. According to the NH 2022 Residential Rental Cost Survey Report, the Median Monthly Gross Rent increased by 36% in Strafford County. The payment standards only increased by an average of 10%. That means renters using HCV assistance have fewer choices about where they can live. Vouchers only cover up to a certain dollar amount and it is increasingly harder to find Dover Landlords willing to rent within that range. Rent increases are far outpacing income of residents. The use of this Waiver is hoped to help close the income and rent gap.

Long Term Goals:

"Opening Doors to Opportunities" is the long-term goal, the Vision, of the Dover Housing Authority.

The objectives of the Moving to Work Program: cost effectiveness, encouraging self-sufficiency, and improving housing choices work hand in hand with the Goals outlined in the DHA 5-year Plan 2020-2024.

A. Work cooperatively with public and private partners to increase the availability of quality housing opportunities (MTW objective Improving Housing Choices)

B. Improve quality of life for residents and the community. With the MTW flexibilities, we can put money where it is needed most to improve buildings, properties and services will help participants be active in the community. (MTW objective Cost Effectiveness, Self-Sufficiency, and Housing Choices)

C. Promote and secure supportive services for eligible persons with limited incomes (MTW objective Self-sufficiency)

D. Ensure Equal Opportunity in Housing (MTW objective Improving Housing Choices)

E. Maintain positive relationships with Board of Commissioners and City Officials. Overseeing financial operations and budgets by the Board plays crucial role in reducing waste (MTW objective Cost Effectiveness). Working with City Officials plays a crucial role in helping increase affordable housing (MTW objective Housing Choices).

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)	Currently Implementing
w. Alternative Income Inclusions/Exclusions (HCV)	Currently Implementing
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)	Currently Implementing
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Currently Implementing
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
c. Self-Certification of Assets (PH)	Currently Implementing
d. Self-Certification of Assets (HCV)	Currently Implementing
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	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)	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)	Not Currently Implemented
b. Increase PBV Project Cap (HCV)	Not Currently Implemented
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
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)	Currently Implementing
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 Dover Plans to Implement in the Submission Year or Is Currently Implementing**1.v. - Alternative Income Inclusions/Exclusions (PH)****Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

Income from assets do not count towards rent calculation.

Income changes do not have to be reported between reexams. This is part of the Rent Reform.

The following exclusions apply if:

(1) A Household reports "0" income.

Any household that reports "0" income must report income within 10 days of establishing income so that an income calculation interim is conducted, and rent is established.

If at reexam time, "0" income is reported, the household must have an interim in 12 months. The interims will continue at 12-month intervals until income and rent are established. After income and rent are established, the household may go to biannual reexams.

(2) Household Composition changes.

All changes in household composition changes must be reported. At that time, an interim will be conducted, all income counted, and rent adjusted. This may result in an increase or decrease in rent.

(3) Household is eligible for Earned Income Disallowance (EID).

A household whose income increases at reexam may be eligible for an EID. If income increases, for the 1st 12 months, 100% of the increase can be disallowed (not counted towards rent calculation). After 12 months, an interim would be conducted and 50% of the increase can be disallowed. 24 months after the EID started, all the income increase counts towards rent calculation. Biannual reexams can be resumed at that time.

With the time saved by staff, the Housing Specialist can work with the Senior Services Coordinator to connect residents with community resources to help Seniors age in place.

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.

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 Waivers and Safe Harbor Waivers for Rent Reform were approved late in 2022, this activity was started in the beginning in February, 2023. Progress will be reported with the 2024 Plan.

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

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

All Public Housing units at DHA include Senior/Disabled units. The Safe Harbor Waiver approval is allowing the same opportunities of self-sufficiency for Seniors/Disabled as for other participants. The goal is for individuals and families to be able to increase their income and have the opportunity to save the money or use it as needed instead of having rent increased right away.

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

Income from assets do not count towards rent calculation.

Income changes do not have to be reported until next reexams.

The following exclusions apply if:

(1) A Household reports "0" income.

Any household that reports "0" income must report income within 10 days of establishing income so that an income calculation interim is conducted, and rent is established.

If, at reexam time, "0" income is reported, the household must have an interim in 12 months. The interims will continue at 12-month intervals until income and rent are established. After income and rent are established, the household may go to biannual reexams.

(2) Household Composition changes.

All changes in household composition changes must be reported. At that time, an interim will be conducted, all income counted, and rent adjusted. This may result in an increase or decrease in rent.

(3) Household is eligible for Earned Income Disallowance (EID).

A household whose income increases at reexam may be eligible for an EID. If income increases, for the 1st 12 months, 100% of the increase can be disallowed (not counted towards rent calculation). After 12 months, an interim would be conducted and 50% of the increase can be disallowed. 24 months after the EID started, all the income increase counts

towards rent calculation. Biannual reexams can be resumed at that time.

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

This activity requires an Agency Specific Waiver for Elderly/Disabled HCV/PBV Holders. The activity applies to all other participants without an exception needed to implement.

Income from assets do not count towards rent calculation.

Income changes do not need to be reported until next scheduled reexamination (which will be set biannually). This is part of Rent Reform and serves as a work incentive since rent will remain stable until next scheduled reexam.

The following exclusions apply if:

(1) A Household reports "0" income.

Any household that reports "0" income must report income within 10 days of establishing income so that an income calculation interim is conducted, and rent is established.

If at reexam time, "0" income is reported, the household must have an interim in 12 months. The interims will continue at 12-month intervals until income and rent are established. After income and rent are established, the household may go to biannual reexams.

(2) Household Composition changes.

All changes in household composition changes must be reported. At that time, an interim will be conducted, all income counted, and rent adjusted. This may result in an increase or decrease in rent.

(3) Household is eligible for Earned Income Disallowance (EID).

A household whose income increases at reexam may be eligible for an EID. If income increases, for the 1st 12 months, 100% of the increase can be disallowed (not counted towards rent calculation). After 12 months, an interim would be conducted and 50% of the increase can be disallowed. 24 months after the EID started, all the income increase counts towards rent calculation. Biannual reexams can be resumed at that time.

(4) Participants in the Family Self Sufficiency (FSS) Program.

Households that have signed an FSS Contract agree to report all increases in income to the Housing Authority. At that time, an interim will be conducted, and rent adjusted with full the increase calculated. The result will be a higher rent and

more money being contributed to the participants Escrow account.

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.

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 Waivers and Safe Harbor Waivers for Rent Reform were approved late in 2022, this activity was started in February 2023 and progress will be reported with the 2024 Plan.

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

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

The Safe Harbor Waiver approval is allowing the same opportunities for self-sufficiency for Seniors/Disabled as for other participants. The goal is for individuals and families to be able to increase their income and having the opportunity to save the money or use it as needed instead of having rent increased right away.

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

Income from assets do not count towards rent calculation.
Income changes do not have to be reported between reexams.

The following exclusions apply if:

(1) A Household reports "0" income.

Any household that reports "0" income must report income within 10 days of establishing income so that an income calculation interim is conducted, and rent is established.

If at reexam time, "0" income is reported, the household must have an interim in 12 months. The interims will continue at 12-month intervals until income and rent are established. After income and rent are established, the household may go to biannual reexams.

(2) Household Composition changes.

All changes in household composition changes must be reported. At that time, an interim will be conducted, all income counted, and rent adjusted. This may result in an increase or decrease in rent.

(3) Household is eligible for Earned Income Disallowance (EID).

A household whose income increases at reexam may be eligible for an EID. If income increases, for the 1st 12 months, 100% of the increase can be disallowed (not counted towards rent calculation). After 12 months, an interim would be conducted and 50% of the increase can be disallowed. 24 months after the EID started, all the income increase counts towards rent calculation. Biannual reexams can be resumed at that time.

(4) Participants in the Family Self Sufficiency (FSS) Program.

Households that have signed an FSS Contract agree to report all increases in income to the Housing Authority. At that time, an interim will be conducted, and rent adjusted with full the increase calculated. The result will be a higher rent and more money being contributed to the participants Escrow account.

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

Use a higher percentage of the the FMR Payment Standard. By increasing the percentage used to 120%, more rentals may be financially obtainable for HCV participants. If a Voucher Holder can pay a higher rent with HAP assistance, more housing choices may be available.

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.

Not yet approved.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

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

Yes

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

2.b. - Payment Standards- Fair Market Rents (HCV); 3.a. - Alternative Reexamination Schedule for Households (PH); 3.b.

- Alternative Reexamination Schedule for Households (HCV)

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

No

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

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 FMR:

FMRs regularly published by HUD, represent the cost to rent a moderately-priced dwelling unit in the local housing market.

NH HUD Metro FMR Area spans twenty-nine counties or cities in New Hampshire.

2.c. - Rent Reasonableness – Process (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

Tenant Portion is 30% of adjusted income. Adjusted income is gross annual income minus allowed deductions for childcare or medical expenses. The Rent Reform Waivers approved in 2022 gave authorization for the following changes. Reexams will be conducted every 2 years (Alternative Reexam Schedule), changes in income do not have to be reported between reexams (Alternative Income Inclusion/Exclusion) and income from assets are not counted towards rent calculation. The following exclusions apply if:

(1) A Household reports "0" income.

Any household that reports "0" income must report income within 10 days of establishing income so that an income calculation interim is conducted, and rent is established.

If at reexam time, "0" income is reported, the household must have an interim in 12 months. The interims will continue at 12-month intervals until income and rent are established. After income and rent are established, the household may go to biannual reexams.

(2) Household Composition changes.

All changes in household composition changes must be reported. At that time, an interim will be conducted, all income counted, and rent adjusted. This may result in an increase or decrease in rent.

(3) Household is eligible for Earned Income Disallowance (EID).

A household whose income increases at reexam may be eligible for an EID. If income increases, for the 1st 12 months, 100% of the increase can be disallowed (not counted towards rent calculation). After 12 months, an interim would be conducted and 50% of the increase can be disallowed. 24 months after the EID started, all the income increase counts towards rent calculation. Biannual reexams can be resumed at that time.

(4) Participants in the Family Self Sufficiency (FSS) Program.

Households that have signed an FSS Contract agree to report all increases in income to the Housing Authority. At that time, an interim will be conducted, and rent adjusted with full the increase calculated. The result will be a higher rent and more money being contributed to the participants Escrow account.

(5) After the first year of a lease, a landlord can change the rent, according to the HCV HAP Contract. An interim will occur but the tenant is not required to report income changes.

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.

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 Waivers and Safe Harbor Waivers for Rent Reform were approved late in 2022, this activity was started in February, 2023. Progress will be reported with the 2024 Plan.

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

No

Describe the method used to determine rent reasonableness and the motivations for using a method different from the standard method.

Rent is determined as 30% of annual income minus allowable deductions. The standard method is to calculate income or anticipated income at least annually and to include income from assets. Eliminating the requirement of reporting income changes between biannual exams will give households the opportunity to establish a budget with stable rent. Households have the opportunity to increase earnings and assets without being discouraged by corresponding increase in rent. The hope is that increased earnings will result in increased savings and ability to handle unexpected or sporadic expenses.

Household assets are normally acquired over time and should be used as a safety net to keep households independent.

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

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

Reexaminations will be reduced from annually to every 2 (two) years for all families.

The objective of this activity is to reduce administrative and residents' time burden Households by reducing the frequency of reexaminations. It is part of Rent Reform.

The following exclusions apply if:

(1) A Household reports "0" income.

Any household that reports "0" income must report income within 10 days of establishing income so that an income calculation interim is conducted, and rent is established.

If at reexam time, "0" income is reported, the household must have an interim in 12 months. The interims will continue at 12-month intervals until income and rent are established. After income and rent are established, the household may begin or resume biannual reexams.

Time saved by the Housing Specialist can be used to work with the Senior Services Coordinator to connect residents with resources to continue to live independently.

(2) Household Composition changes.

All changes in household composition changes must be reported. At that time, an interim will be conducted, all income counted, and rent adjusted. This may result in an increase or decrease in rent.

(3) Household is eligible for Earned Income Disallowance (EID).

A household whose income increases at reexam may be eligible for an EID. If income increases, for the 1st 12 months, 100% of the increase can be disallowed (not counted towards rent calculation). After 12 months, an interim would be conducted and 50% of the increase can be disallowed. 24 months after the EID started, all the income increase counts towards rent calculation. Biannual reexams can be resumed at that time.

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.

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 Waivers and Safe Harbor Waivers for Rent Reform were approved late in 2022, this activity was started in February, 2023. Progress will be reported with the 2024 Plan.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

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

Yes

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

2.b. - Payment Standards- Fair Market Rents (HCV); 3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)

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

No

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

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?

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

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

The Safe Harbor Waiver approval is allowing the same opportunities of self-sufficiency for Seniors/Disabled as for other participants. The goal is for individuals and families to be able to increase their income and have the opportunity to save the money or use it as needed instead of having rent increased right away. Instead, changes only have to be reported every other year.

Does the MTW activity require an impact analysis?

Provided Already

What is the recertification schedule?

Once every two 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.

All changes in household composition changes must be reported. At that time, an interim will be conducted, all income counted, and rent adjusted. This may result in an increase or decrease in rent.

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

Reexaminations will be reduced from annually to every 2 (two) years for all families.

The objective of this activity is to reduce administrative and residents' time burden Households by reducing the frequency of reexaminations. It is part of Rent Reform.

The following exclusions apply if:

(1) A Household reports "0" income.

Any household that reports "0" income must report income within 10 days of establishing income so that an income calculation interim is conducted, and rent is established.

If at reexam time, "0" income is reported, the household must have an interim in 12 months. The interims will continue at 12-month intervals until income and rent are established. After income and rent are established, the household may begin or resume biannual reexams.

(2) Household Composition changes.

All changes in household composition changes must be reported. At that time, an interim will be conducted, all income counted, and rent adjusted. This may result in an increase or decrease in rent.

(3) Household is eligible for Earned Income Disallowance (EID).

A household whose income increases at reexam may be eligible for an EID. If income increases, for the 1st 12 months, 100% of the increase can be disallowed (not counted towards rent calculation). After 12 months, an interim would be conducted and 50% of the increase can be disallowed. 24 months after the EID started, all the income increase counts towards rent calculation. Biannual reexams can be resumed at that time.

(4) Participants in the Family Self Sufficiency (FSS) Program.

Households that have signed an FSS Contract agree to report all increases in income to the Housing Authority. At that time, an interim will be conducted, and rent adjusted with full the increase calculated. The result will be a higher rent and more money being contributed to the participants Escrow account.

(5) Landlord changes rent. If a landlord changes rent within the terms of the HAP Contract, a reexam will take place but income changes will not be counted until the next regular reexam time.

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.

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.

This activity is beginning in February, 2023. Progress will be reported with the 2024 Plan.

Does this MTW activity require a hardship policy?

Provided Already

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

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

The Safe Harbor Waiver approval is allowing the same opportunities of self-sufficiency for Seniors/Disabled as for other participants. The goal is for individuals and families to be able to increase their income and having the opportunity to save the money or use it as needed instead of having rent increased right away.

Does the MTW activity require an impact analysis?

Provided Already

What is the recertification schedule?

Once every two 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.

All changes in household composition changes must be reported. At that time, an interim will be conducted, all income counted, and rent adjusted. This may result in an increase or decrease in rent.

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

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

Assets under \$50,000 can be self-certified.

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 Waivers and Safe Harbor Waivers for Rent Reform were approved late in 2022, this activity was started in February, 2023. Progress will be reported with the 2024 Plan.

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

No

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

\$50,000.

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

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

Assets under \$50,000 can be self-certified. This activity eliminates some administrative burden for staff. Income from assets is no longer counted towards rent. Time used to collect and verify bank statements and asset balances is time staff could use more efficiently.

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 this Waivers and Safe Harbor Waivers submitted were approved late in 2022, this activity was started in February, 2023. Progress will be reported with the 2024 Plan.

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

No

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

\$50,000.

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

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

Household may qualify for graduation if requirements are met under contract. Participants cannot miss more than 3 meetings in a row other they will be terminated from the program and forfeit their escrow. This will hold participants more accountable and is cost-effective since time will not be wasted on missed appointments. The Head of Household does not have to be employed if another member is working. Any person in the household that is employed qualifies the Household as "employed". Household does not have to be off TANF to graduate. The new graduation requirements encourage self sufficiency and enable Household to use escrow money for education or home ownership.

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

Cost effectiveness; 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.

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.

This waiver was put into place in February 2023. Progress will be evaluated and reported with the 2024 Plan.

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.

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
2021	\$866,194	\$644,219	\$0	2027-09-30
2022	\$777,572	\$579,831	\$197,741	2030-09-30
2023	\$751,212	\$158,976	\$592,236	2031-09-30

G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
	80%-50% Area Median Income	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?
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G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.	

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

H.	Public Comment
	Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.

I.	Evaluations.
	No known evaluations.

Hardship Policy

The Hardship Policy applies to the following MTW Activities:

Payment Standards: 2b.

Rent Policies: 3a., 3b.

Safe Harbor Waiver: Rent Policies to include Elderly/Disabled (1v. and 1w.)

Hardship Exemptions provide temporary relief to participating households experiencing significant or unexpected increases in rent burden. Each request will be reviewed and weighed against other local resources available to the family. The result of the review may consist in referral to other local resources, and/or an adjustment in the portion of the family's rent.

Households that experience a decrease in income that is not expected to be short term or nonsignificant, may request an interim to have rent adjusted at any time in between regular examinations. Households with expenses that would allow new deductions may also request an interim.

Process for Agency Review and Determination

The Household:

- A hardship request must be made in writing, stating both the reason for the hardship and the expected duration. With the request, the Household is required to provide documentation of the decreased income or increased expenses. There is no limit to the number of times a household may request an interim under the hardship policy.

The Agency will take the following actions:

- Refer the tenant to Community Action Program or other assistance for immediate and/or short-term assistance.
- Suspend the rent beginning the next month after the request until the agency has determined if the request is warranted.
- The Housing Specialist assigned to the participant's program will determine whether a hardship exists within a reasonable time after the family request.

The standard for this hardship will be if the changes result in a higher rent burden of at least 5% for more than 1 month, if outside assistance is not available and the decrease is not due to seasonal hours. In the case of seasonal work, a temporary hardship waiver may be granted for 3-6 months. After that, an interim may be conducted and if needed, another hardship may be applied for.

A household that reports "0" income from any source, or reports "0" income from wages, salary, or business, may qualify for the hardship waiver. However, if the household gains income above "0" from any source, the household is required to report it within 14 days. At that time, another interim will take place and rent will be recalculated. If no income is obtained, an interim exam will be required every 12 months until income and rent can be established. After tenant rent is established, regular reexams be resume (biannually).

If the request does not meet the hardship standard or if proof of hardship is not provided, the agency must resume rent and collect any retroactive rent, if applicable. If an exemption is denied, the resident has the right to a second review through the grievance procedure attached.

FY23 DHA Impact Analysis

Payment Standards-Fair Market Rent

1. Impact on the agency’s finances (e.g., how much will the activity cost, any change in the agency’s per family contribution)

Payment standards for vouchers across all bedroom sizes will increase to 120% to provide greater housing choice for households on the waiting list in an extremely tight rental market. HAP expenses will increase, but DHA can manage the increase through increased utilization and Admin Fee reserves.

Bedroom Size	2023 FMR	Percent Proposed	Payment Standard @ 120%	Increase from 2023 Payment Standard
0 Bedroom	\$1,112.00	120%	\$ 1,334.18	\$ 222.18
1 Bedroom	\$1,232.00	120%	\$ 1,478.15	\$ 246.15
2 Bedroom	\$1,563.00	120%	\$ 1,875.29	\$ 312.29
3 Bedroom	\$2,034.00	120%	\$ 2,440.39	\$ 406.39
4 Bedroom	\$2,488.00	120%	\$ 2,985.10	\$ 497.10

2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)

DHA’s analysis indicated a change for a minimal number of current voucher holders. Currently, 30% of DHA Voucher Holders pay more than 30% of their income for rent due to high rental costs. Setting the standards higher will lower the percentage down to, or closer to, the 30% “affordable” standard.

3. Impact on the agency’s waitlist(s) (e.g., any change in the amount of time families are on the waitlist)

Implementation of this activity should shorten the family’s time on the waiting list. The guideline for “affordable rent”, being less restricted, will open up more housing choices and less time may be needed to find a suitable unit. Based on a report sample from October 2022-May 2023, 50% of vouchers issued leased up within the initial 60 days allowed. Some of those lease “in place” and do not have to search for a unit. Extensions are requested by 40% and 10% of vouchers expire. Of the 40% with extensions, 50% of those also expire. There is a high psychological cost for those searching for units that fit within the current payment standards and being rejected by landlords in higher opportunity areas.

4. Impact on the agency’s termination rate of families) (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)

Fewer terminations are expected because rents will be more affordable. Landlords will have more incentive to keep HCV Holders if they can raise the rents without risking rent delinquencies due to income hardship.

5. **Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program.** Fluctuations will still occur due to normal turnaround times of vouchers. DHA anticipates a higher utilization rate as a result of this activity.
6. **Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice** Increased payment standards will increase *housing choices* for low-income families by enabling them to move to higher opportunity areas. This is our primary goal of this activity. The activity will also increase *self-sufficiency*, as residents will be able to move to areas of higher opportunity with more access to community resources, job training, transportation, and employment. *Cost effectiveness* will also be increased as increased self-sufficiency will long-term result in decreased HAP payments and a decrease in administrative work as fewer tenants will need to move due to rent increases.
7. **Impact on the agency's ability to meet the MTW statutory requirements**
 - 1) **Ensure 75% of households are very low-income.** No impact expected. Income requirements remain unchanged.
 - 2) **Establish a reasonable rent policy that encourages employment and self-sufficiency.** No impact expected. Policy remains the same.
 - 3) **Continue to assist substantially the same total number of eligible low-income households.** Utilization is expected to go up with the increased housing choices.
 - 4) **Continue to assist a comparable mix of households by family size.** This activity is not expected to affect the family sizes being served.
 - 5) **Meet Housing Quality Standards.** This activity is expected to have a positive impact on our ability to ensure housing assisted under the MTW Demonstration Program meets housing quality standards established as higher quality units will become available due to the higher payment standards.
8. **Impact on the rate of hardship requests and the number granted and denied as a result of this activity** No impact is expected.
9. **Across the other factors above, the impact on protected classes (and any associated disparate impact)** All voucher holders, including any protected classes are expected to benefit with this activity by opening up housing choices. Housing areas that may have not been affordable to households in the past, may be more obtainable financially.

Resident Advisory Board (RAB) Meetings

On March 16 and March 22, 2023 a total of 5 RAB meetings were held. The Executive Director, several staff members, and a total of 50 residents/participants attended the meetings.

The PHA Annual Plan FYB 2023, 5-year Capital Fund Plan FYB 2023, Moving to Work (MTW) Supplement to Plan FYB 2023 were presented by Kathy Noel, Administrative Assistant and Zachary Messier, Capital Funds Coordinator. Ryan Crosby, the Executive Director, and other staff were also present to take questions and comments.

MTW Supplement: Comments and questions

Several residents and HCV participants were happy to hear reexams would be every 2 years instead of annually.

Several Residents commented they were happy to hear income increases would not change their rent until reexam time. One resident asked how the income would be calculated when the exam time came. A staff member explained the most current 4 pay stubs would be used for income.

A Senior asked how Pension disbursements would be handled with the Rent Reform. Staff explained interest and dividends from assets were not to be counted towards income. A Pension that is being drawn down is not considered an asset, but income. Regular Pension payments count towards income for rent calculation.

A resident wanted to know why the Housing Authority asks what he has for assets and where money goes if his assets go down. A Housing Staff Member explained the information about disposed assets is required by HUD. After the meeting, a follow-up letter was sent to the resident along with a copy of the 24 CFR 5.603(b).

One resident asked what would happen if they had a decrease in income between reexams. Kathy Noel explained the Rent Reform Waivers include that an interim can be done if income decrease to a lower rent if needed.

No other questions or comments were made.

Public Hearing

A Public Hearing was held Tuesday, March 28, 2023 at 11:45 a.m. for the PHA Annual Plan FYB 2023, the Moving to Work (MTW) Supplement to the Annual Plan and the Capital Fund 5-Year Plan for 2023-2027.

Attendance: Timothy Granfield, Chair of the Board of Commissioners; Ryan Crosby, Executive Director; Kathy Noel, Administrative Assistant; Laurie Young, Commissioner; Noreen Biehl, Commissioner

No members of the Public attended.

Meeting Adjourned at 11:50.

Analysis of Feedback

The feedback during the RAB Meetings was mostly positive.

Positive feedback on the following approved 2022 Waivers was noted:

Biannual exams will reduce the burden on residents to collect and report information.

Income increases will not automatically increase rent.

Self-Certification may be signed for assets under \$50,000.

Income from assets is not counted for rent calculation.

Resident Meetings in 2023 were attended by less than 10% of the population. It is important to our MTW process that we get as much input as we can from residents and participants. To encourage input, surveys were sent out to all. We accepted surveys in-person, online and by mail. We incentivized participation with raffles and the results were positive. The deadline for the surveys was February 28 and we are in the process of compiling results.

There is “cautious optimism” with residents hearing income increases are only required to be reported every other year, except in certain cases. The staff will stay in close contact with residents, communicate through email, phone calls and letters to help with questions, concerns, and encouragement.

For future consideration:

The MTW Supplement, with Safe Harbor Waivers, was not fully approved until November 2022. As a result, we have just recently been able to start implementing the Waivers. The DHA has consciously decided to request just one new waiver this year, related to Housing Choice and higher payment standards.

We plan to use the upcoming months to evaluate the results of the surveys. Before exploring more Waivers in 2024, we will evaluate the impact of the Waivers implemented.

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (07/01/2023), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

Dover Housing Authority

nh003

MTW PHA NAME

MTW PHA NUMBER/HA CODE

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Timothy Granfield

Board of Commissioners, Chair

NAME OF AUTHORIZED OFFICIAL

TITLE


SIGNATURE

3/28/23
DATE

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