

PHA Name : Dover

PHA Code : NH003

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2024

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: Simplifying deductions, rent calculation, and reducing Recertifications to every other year, help participants become more self-sufficient. Families are encouraged to work more and budget to increase savings or use income 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. The Family Self-Sufficiency Program continues to help families move out of assisted housing to other areas and in some cases become homeowners. Raising Payment Standards has helped to 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. 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.

- Alternative Examination Schedules for Public Housing. All new and current participants' certifications 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.
- Rental Payment Standards for Housing Choice Vouchers has been increased for up to 120%
- Family Self-sufficiency graduation requirement to be off TANF for 12 mos. was eliminated. After some reevaluation, the Dover Housing Authority will change this (pending approval) to require the FSS Household be off TANF but without the expectation that they be off for 12 months. 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 5 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.

The Housing Authority's original draft of the MTW Plan FYB 2024 included the request to allow a "Transportation Deduction" for PBV/HCV participants. After feedback from residents, staff and the public, we have put that request on hold. Instead, the Housing Authority is extending a request for a Standard Deduction for Elderly/Disabled in all programs and developments.

New Activities pending approval for 2024:

- Elderly/Disabled (PH/HCV/PBV): Replace the \$525 Standard Deduction and the Medical Deduction with a \$1550 Standard "Wellness Deduction"
- HCV Landlords: Offer Vacancy Loss incentive up to \$1000 if a DHA Voucher Holder moves out and the unit is released to another DHA Voucher Holder.

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 Objectives: 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)	Plan to Implement in the Submission Year
u. Standard Deductions (HCV)	Plan to Implement in the Submission Year
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)	Currently Implementing
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)	Plan to Implement in the Submission Year
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Not Currently Implemented
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)	Plan to Implement in the Submission Year
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.t. - Standard Deductions (PH)
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>This Deduction will replace 2 other deductions</p> <ul style="list-style-type: none"> • Elderly/Disabled Household Deduction which is a standard amount determined by HUD • Medical Deduction which is a deduction for itemized out-of-pocket medical expenses over a certain threshold determined by HUD. <p>An Elderly/Disabled Household is defined as a household in which the head of household, their spouse, or co-head (or the sole household member) is:</p> <ul style="list-style-type: none"> o At least 62 years of age; o Handicapped; or, o Disabled <p>If a Household is determined to qualify as Elderly or Disabled, a new "Wellness Deduction" of \$1550 will be allowed with no other special documentation. It will no longer be necessary to itemize medical expenses, gather receipts or proof of medical payments as in the past to apply for a Medical Deduction. This will save residents time and reduce the administrative burden. The deduction is for general "Wellness" needs such as medical insurance, doctor visits, hospital expenses, wellness classes, transportation needs, and other health needs. The purpose is to give a flat rate deduction to help with expenses that may not fit into the narrow category of Medical Expenses.</p> <p>Each family is limited to only one Wellness Deduction, even if both the head and spouse are elderly or disabled. There will continue to be a \$50 minimum rent regardless of income deductions.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness; Self-sufficiency</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Decreased revenue</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>New admissions and currently assisted households</p>
<p>Does the MTW activity apply to all family types or only to selected family types?</p> <p>The MTW activity applies only to selected family types</p>
<p>Please select the family types subject to this MTW activity.</p> <p>Elderly families; Disabled families (to the extent those families are not exempt via a reasonable accommodation)</p>
<p>Does the MTW activity apply to all public housing developments?</p> <p>The MTW activity applies to all developments</p>
<p>Does this MTW activity require a hardship policy?</p> <p>Yes</p>

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.)
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement? No
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? Yes
How much will the single standard deduction be in the Fiscal Year? \$1,550

1.u. - Standard Deductions (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative This Deduction will replace 2 other deductions <ul style="list-style-type: none"> • Elderly/Disabled Household Deduction which is a standard amount determined by HUD • Medical Deduction which is a deduction for itemized out-of-pocket medical expenses over a certain threshold determined by HUD. An Elderly/Disabled Household is defined as a household in which the head of household, their spouse, or co-head (or the sole household member) is: <ul style="list-style-type: none"> o At least 62 years of age; o Handicapped; or, o Disabled If a Household is determined to qualify as Elderly or Disabled, a new "Wellness Deduction" of \$1550 will be allowed with no other special documentation. It will no longer be necessary to itemize medical expenses, gather receipts or proof of medical payments as in the past to apply for a Medical Deduction. This will save residents time and reduce the administrative burden. The deduction is for general "Wellness" needs such as medical insurance, doctor visits, hospital expenses, wellness classes, transportation needs, and other health needs. The purpose is to give a flat rate deduction to help with expenses that may not fit into the narrow category of Medical Expenses. Each family is limited to only one Wellness Deduction, even if both the head and spouse are elderly or disabled. There will continue to be a \$50 minimum rent regardless of income deductions.
Which of the MTW statutory objectives does this MTW activity serve? Cost effectiveness; Self-sufficiency
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased revenue
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?
The MTW activity applies only to a subset or subsets of assisted households
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?
New admissions and currently assisted households
Does the MTW activity apply to all family types or only to selected family types?
The MTW activity applies only to selected family types
Please select the family types subject to this MTW activity.
Elderly families; Disabled families (to the extent those families are not exempt via a reasonable accommodation)
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?
The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.
This MTW activity applies all to all DHA project-based vouchers and all tenant-based vouchers whose rent calculations are conducted by the DHA.
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.)
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?

Yes

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

\$1,550

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

This activity required a Safe Harbor Waiver for Elderly/Disabled HCV/PBV Holders which was approved in 2022. The activity applies to all other participants without an exception needed to implement.

Income from assets do not count towards rent calculations.

Income changes do not need to be reported until next scheduled reexamination (which will be set biennially). 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:

(1) A Household reports "0" income or has no earned income.

Any household member or household that reports "0" income or no earned income must report all changes of income in writing within 10 days from the date of change. An interim rent calculation will then be performed to determine new rent. If at the time of reexamination, any household reports "0" income, the household must have an interim within 12 months. Reexaminations will continue annually until income and rent are established.

After income and rent are established, the household may go to biennial reexaminations.

(2) Household Composition changes.

All changes in household composition changes must be reported. At that time, a reexamination will be conducted, to add or remove the household member and update household income. At this time, rent will be 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. Biennial reexams can be resumed at that time.

*EID is being phased out by HUD. No new Households will be eligible for EID. The above exception will no longer apply.

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.

Fewer interims were conducted since income increases no longer triggered a rent increase. between regular biennial exams. This served to encourage Households to increase income without the consequence of paying more rent. It also saved administrative time since staff did not conduct reexams every time there were small changes in income . Income

from assets not being counted has not had a significant financial impact but has saved administrative time.

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 Elderly/Disabled as for other participants.

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

Income from assets do not count towards rent calculation. Income changes do not trigger rent changes between reexams.

Exceptions are stated in Section C.1.v. , the description of the waiver.

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 required a Safe Harbor Waiver for Elderly/Disabled HCV/PBV Holders which was approved in 2022. The activity applies to all other participants without an exception needed to implement.

Income from assets do not count towards rent calculations.

Income changes do not need to be reported until next scheduled reexamination (which will be set biennially). 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:

(1) A Household reports "0" income or has no earned income.

Any household member or household that reports "0" income or no earned income must report all changes of income in writing within 10 days from the date of change. An interim rent calculation will then be performed to determine new rent. If at the time of reexamination, any household reports "0" income, the household must have an interim within 12 months. Reexaminations will continue annually until income and rent are established.

After income and rent are established, the household may go to biennial reexaminations.

(2) Household Composition changes.

All changes in household composition changes must be reported. At that time, a reexamination will be conducted, to add or remove the household member and update household income. At this time, rent will be 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. Biennial reexams can be resumed at that time.

*EID is being phased out by HUD. No new Households will be eligible for EID. The above exception will no longer apply.

(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, FSS participants can opt to have an interim 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.

Fewer interims were conducted since income increases no longer triggered a rent increase. between regular biennial exams. This served to encourage Households to increase income without the consequence of paying more rent. It also saved administrative time since staff did not conduct reexams every time there were small changes in income . Income from assets not being counted has not had a significant financial impact but has saved administrative time.

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 Elderly/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 increase 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 trigger rent changes between reexams. Exceptions are stated in Section C.1.w., the description of the waiver.

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 FMR Payment Standard. By increasing the Standards used up to 120%, more rentals may be financially obtainable for HCV participants. If a Voucher Holders 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.

Fewer Voucher holders are paying more than 30% of their income towards rent.

Does this MTW activity require a hardship policy?

No

No document is attached.

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

No

Does the MTW activity require an impact analysis?

No

No document is attached.

Please explain the payment standards by FMR:

FMRs regularly published by HUD represent the cost of a moderately-priced dwelling unit in the local housing market. NH HUD Metro FMR spans 29 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

MTW agencies must implement at least one reasonable rent policy designed to encourage employment and self-sufficiency by participating families. MTW agencies may choose to implement multiple MTW activities for this purpose. While MTW agencies are only required to implement one reasonable rent activity and have no particular requirement for the timing or duration of the activity, many MTW agencies will want to implement this type of MTW activity early on to encourage employment and self-sufficiency.

The DHA meets this requirement by:

- Establishing Tenant Rent Policy activities
- Using Alternate Reexamination Schedules

The 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:

(1) A Household reports "0" income or has no earned income.

Any household member or household that reports "0" income or no earned income must report all changes of income in writing within 10 days from the date of change. An interim rent calculation will then be performed to determine new rent. If at the time of reexamination, any household reports "0" income, the household must have an interim within 12 months. Reexaminations will continue annually until income and rent are established.

After income and rent are established, the household may go to biennial reexaminations.

(2) Household Composition changes.

All changes in household composition changes must be reported. At that time, a reexamination will be conducted, to add or remove the household member and update household income. At this time, rent will be 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. Biennial reexams can be resumed at that time.

*EID is being phased out by HUD. No new Households will be eligible for EID. The above exception will no longer apply.

(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, FSS participants can opt to have an interim 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.

The Rent Reforms approved have cut down on Administrative burden, encouraged participant employment and increased income. Over time, we hope to see that Households are able to save money and/or handle expenses better.

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 biennial 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:

(1) A Household reports "0" income or has no earned income.

Any household member or household that reports "0" income or no earned income must report all changes of income in writing within 10 days from the date of change. An interim rent calculation will then be performed to determine new rent.

If at the time of reexamination, any household reports "0" income, the household must have an interim within 12 months. Reexaminations will continue annually until income and rent are established.

After income and rent are established, the household may go to biennial reexaminations.

(2) Household Composition changes.

All changes in household composition changes must be reported. At that time, a reexamination will be conducted, to add or remove the household member and update household income. At this time, rent will be 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. Biennial reexams can be resumed at that time.

*EID is being phased out by HUD. No new Households will be eligible for EID. The above exception will no longer apply.

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

Cost effectiveness; Self-sufficiency

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

Decreased revenue

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.

Staff has saved time by not having to do reexams every year. Participants have been able to use or save increased income without having to pay higher rent until reexam time.

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 is allowing the same opportunities for Elderly/Disabled as for other participants. The goal is for individuals and families to increase income and have the opportunity to save the extra money or use it as needed instead of having rent increased right away. Increases in income affect rent only every other year at reexams.

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, a reexamination will be conducted, to add or remove the household member and update household income. At this time, rent will be 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:

(1) A Household reports "0" income or has no earned income.

Any household member or household that reports "0" income or no earned income must report all changes of income in writing within 10 days from the date of change. An interim rent calculation will then be performed to determine new rent. If at the time of reexamination, any household reports "0" income, the household must have an interim within 12 months. Reexaminations will continue annually until income and rent are established.

After income and rent are established, the household may go to biennial reexaminations.

(2) Household Composition changes.

All changes in household composition changes must be reported. At that time, a reexamination will be conducted, to add or remove the household member and update household income. At this time, rent will be 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. Biennial reexams can be resumed at that time.

*EID is being phased out by HUD. No new Households will be eligible for EID. The above exception will no longer apply.

(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, FSS participants can opt to have an interim 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.

Decreased revenue

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

The MTW activity applies 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.

Administrative burden has decreased and staff has been able to focus on some supportive services. Participants' rents have been more stable.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Provided Already

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, a reexamination will be conducted, to add or remove the household member and update household income. At this time, rent will be 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.

Administrative burden has decreased and staff has been able to focus on some supportive services.

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.

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.

Administrative burden has decreased and staff has been able to focus more on supportive services.

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

No

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

\$50,000.

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

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

Landlords that have been renting to a DHA Voucher Holder that moves out or changes units may apply for a Vacancy Loss Incentive. If the Landlord rents the unit to another DHA Voucher Holder, the Landlord may be eligible for a prorated contract rent payment up to \$1000. The payment will be made after the new contract is executed.

This activity is likely to be effective in Dover's market as landlords will realize the benefit of receiving rental income during unit turnover. By continuing their participation in the HCV rental subsidy program and renting to another HCV family they will minimize the cost of the unit's down time.

The Housing Authority may provide vacancy information to DHA participants. The Voucher Holder still chooses where to rent and Landlords are still responsible to screen potential tenants.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

N/A Pending approval

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?

\$1000

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

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 or they may 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". Since the approval of this waiver in 2022, Households did not have to be off TANF to graduate. We are requesting to change the requirement to be that the family does have to be off TANF before they can graduate. The new graduation requirements encourage self sufficiency and enable Household to use escrow money for education, home ownership, or other program goals.

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

Cost effectiveness; Self-sufficiency; 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 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 an increase in terminations from the program and an increase in early graduations.

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</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? No</p>
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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	\$221,975	2027-09-30
2022	\$777,572	\$579,831	\$197,741	2030-09-30
2023	\$926,260	\$645,838	\$280,422	2031-09-30
2024	\$889,439	\$224,560	\$664,879	2032-09-30

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

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

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

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

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

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

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

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

I.	Evaluations.
No known evaluations.	

Analysis of Feedback

The Plans were presented to a mixed audience which means each Waiver or part of the PHA Plan did not apply to every person present. For example, the Standard Deduction change only applies to Public Housing Elderly/Disabled but one of the residents at the meeting was a person with a Disability living at Whittier Falls with a PBV. The Standard Deduction (Wellness Deduction) would not apply to that particular person. Since we had one meeting for all residents and participants, it can be a challenge to explain who each change may affect. In the future we may decide to do separate meetings for different groups.

Surveys give residents an opportunity to provide feedback but participation is limited. We will continue doing surveys annually since we do hear from participants we wouldn't otherwise hear from.

There was a fair amount of discussion about the Resident Councils and what they can do. The residents present at the meeting wanted to form a council right away and volunteer as officers of the council. We explained that it has to be opened up to all residents to vote for officers and everyone must be given the opportunity to participate. We have provided handouts about the council and referred the residents to the online guides.

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 (07/01/2024), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

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

3/26/2024
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.*