

# PHA Name : Hawaii Public Housing Authority

**PHA Code :** HI001

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

**PHA Program Type:** Combined

**MTW Cohort Number:** Landlord Incentives

**MTW Supplement Submission Type:** Amended Annual Submission

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

The HPHA's vision for the Moving to Work (MTW designation) is to become a more proactive, innovative agency that identifies, develops, and implements housing policies that address local needs; increase self-sufficiency outcomes for participants; provide greater mobility and access to housing options; and promote efficiency and efficacy throughout service delivery and operations.

MTW participation will allow the HPHA to better adapt to change and develop local solutions to address unmet housing needs, economic self-sufficiency, and program cost-effectiveness. The HPHA plans to implement a local, non-traditional activity, as well as to implement the five proposed MTW activities submitted in its amended FY 2022-2023 MTW Supplement to the PHA Plan. These initiatives will allow the HPHA to provide meaningful workforce training to its public housing residents, provide landlord incentives, waive initial unit inspections, enable victims of domestic violence and disabled families to find units in the voucher program, and engage in housing development programs.

The HPHA shall initiate a local, non-traditional activity to establish a workforce training pilot program. This two-year pilot program shall provide part-time, on-the-job training opportunities beyond those traditionally provided through the PHA Tenant-Aide program.

The HPHA's ongoing activities include four landlord incentive programs that will encourage landlord involvement through monetary and efficiency incentives. Increased landlord participation and retention will improve the overall cost effectiveness of the HCV program.

- **Front-End Vacancy Loss payments:** This activity would allow the HPHA to provide financial incentives to landlords to cover the cost of an unoccupied unit where the landlord has a history of renting to an HCV participant, but the unit was not previously occupied by an HCV tenant. Eligible landlords would receive a financial incentive equal to one month's rent if a vacancy occurred between tenants. The HPHA believes this incentive could encourage former landlords to return to the HCV program, increase housing options, and decrease average participant search times.
- **Vacancy Loss Payments:** This activity would allow the HPHA to provide financial incentives to a landlord for their continued participation in the program. Eligible landlords would receive a financial incentive equal to one month's rent for the time that a unit was vacant between HCV tenants. The HPHA believes this incentive could improve the agency's ability to incentivize landlords to remain in the HCV program, increase housing options, and decrease average participant search times.
- **Other Landlord Incentives:** This activity would allow HPHA to provide financial incentives to recruit new landlords to join the HCV program (i.e., "signing bonuses"). The HPHA would provide an incentive payment equal to one month's rent for new landlords who leased properties in "high opportunity areas" or in "areas located where vouchers are difficult to use". The HPHA will initially define these terms broadly, but eligibility criteria may evolve based on testing results. The HPHA believes this incentive could improve the agency's ability to recruit landlords to the HCV program, increase housing options, and decrease average participant search times.
- **Waiver of Mandatory Initial Inspections:** This activity would allow HPHA to eliminate the requirement of initial inspections and decrease the time it takes to lease-up families into new units. The HPHA would waive initial inspections for units that 1) were less than five years old, 2) had recently passed an HQS or equivalent inspection within the previous three years, or 3) were located in a census tract with a poverty rate below ten percent provided the landlord certified that their unit is free from any life-threatening deficiencies. The HPHA believe this incentive could shorten the time it takes a participant to move into a unit, improve landlord recruitment to the HCV program, increase housing options, and decrease average participant search times.

The HPHA is proposing an amendment to the MTW Supplement for FY 24 to request HUD's approval of MTW Waiver 3.b. which would allow the HPHA to conduct reexaminations of HCV households every two years.

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

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

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

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

<b>3.b. - Alternative Reexamination Schedule for Households (HCV)</b>
<p><b>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</b></p> <p>Under this activity, the HPHA would conduct reexaminations of HCV households every two years. The HPHA would not limit the number of interim adjustments a household may request. The goals of this activity are to alleviate administrative burden and to create an incentive for families to increase their income between reexaminations.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness; Self-sufficiency</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>N/A. The HPHA will be implementing this activity.</p>
<p><b>Does this MTW activity require a hardship policy?</b></p> <p>Yes</p> <p>This document is attached.</p>
<p><b>Does the hardship policy apply to more than this MTW activity?</b></p> <p>No</p>
<p><b>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</b></p> <p>No</p>
<p><b>How many hardship requests have been received associated with this activity in the past year?</b></p> <p>No hardship were requested in the most recent fiscal year.</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>Does the MTW activity require an impact analysis?</b></p> <p>Yes</p> <p>This document is attached.</p>
<p><b>Does the impact analysis apply to more than this MTW activity?</b></p> <p>No</p>

**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.**

HCV families will still be required to report any changes to income or household circumstances that might affect their ability to pay rent. The HPHA will not limit the number of interim reexaminations or hardship exemptions that a family can request.

**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**

This vacancy loss-activity allows the HPHA to provide financial incentives to landlords for their continued participation in the HCV program. Eligible landlords can receive financial incentives equal to one month's rent for vacancies that occur between two HPHA HCV tenants.

The goals of this activity are to maintain and increase landlord participation, increase housing options, and decrease average participant search times.

**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 only to a subset or subsets of assisted households

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

New admissions and currently assisted households

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

The MTW activity applies to all family types

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

The MTW activity applies to all tenant-based units

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

The HPHA developed the rules, policies, and forms for this incentive activity. This incentive activity will be fully implemented during FY 2024.

**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?**

The landlord may not receive more than an amount equal to one month's rent for the unit. There is no cap on how many times the landlord may qualify and receive the payment, so long as the unit is rented to an HPHA HCV tenant immediately following the vacancy of another HPHA HCV tenant.

**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

**4.c. - Other Landlord Incentives (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**

This activity would allow HPHA to provide financial incentives to recruit new landlords to join the HCV program (i.e., "signing bonuses"). The goal of this activity is to increase new units enrolled into the HCV program. The HPHA would provide an incentive payment equal to one month's rent for new landlords who leased properties in "high opportunity areas" or in "areas located where vouchers are difficult to use". There would be no cap for how many new units one particular landlord can enroll into the program. The HPHA will initially define these terms broadly, but eligibility criteria may evolve based on testing results. The HPHA believes this incentive could improve the agency's ability to recruit landlords to the HCV program, increase housing options, and decrease average participant search times.

**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 only to a subset or subsets of assisted households

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

New admissions (i.e., applicants) only

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

The MTW activity applies to all family types

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

The MTW activity applies to all tenant-based units

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

The HPHA developed rules, policies, and forms for this incentive activity. This activity will be fully implemented during FY 2024.

**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?)**

Certain types of units only

**What is the maximum payment that can be made to a landlord under this policy?**

Payments will not exceed one month's rent. A landlord will only qualify for this payment once per unit rented to an HPHA HCV participant for the first time.

**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

#### 17.b. - Service Provision

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

The HPHA intends to establish a two-year Public Housing Tenant Workforce Training Pilot Program with the goal of empowering public housing tenants by increasing household incomes and teaching valuable work skills that increase success in the local job market. The HPHA intends to award a contract for the operation and administration of the pilot program via a competitive bidding process. The entity awarded the contract will provide public housing residents with part-time, on-the-job training opportunities that will provide them the knowledge and experience necessary to find employment in certain building and administrative trades.

The HPHA will seek initial seed funding for the pilot program from the Hawaii State Legislature in 2023. If State funding is not appropriated or if funding is not continued beyond the first year of the pilot program's operation, the HPHA will utilize MTW funding made available through this Local, Non-Traditional Activity waiver. The Agency shall not exceed more than ten percent of its HAP budget on this local, non-traditional activity.

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

Self-sufficiency

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

Increased expenditures

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



The MTW activity applies 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.**

No services currently being provided. The HPHA is intending to establish this program during FY 2024.

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

No

**What types of services is the MTW agency providing?**

N/A. The MTW activity is still pending implementation.

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

0

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

The MTW activity applies to specific units/properties

**Describe which LNT units/properties participate in the MTW activity?**

The pilot program will be made available first to any tenant of working age that resides in a federal low-income public housing property. Access to the program may be limited, subject to the availability of funding. The HPHA may consider expansion of the program to HCV families.

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

No

<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<p><b>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</b></p> <p>No Safe Harbor Waivers are being requested.</p>

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>
<b>E.1</b>	<p><b>Agency-Specific Waiver(s) for HUD Approval:</b></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><b>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</b></p> <p>No Agency-Specific Waivers are being requested.</p>
<b>E.2</b>	<p><b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b></p> <p><b>Does the MTW agency have any approved Agency-Specific Waivers?</b></p> <p>MTW Agency does not have approved Agency-Specific Waivers</p>

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

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	\$29,585,170	\$29,585,170	\$0	2029-09-30
2022	\$27,406,287	\$27,406,287	\$5,962,561	2030-09-30
2023	\$34,131,336	\$0		2031-09-30

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

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

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>
<b>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?</b> No	
<b>Please describe the MTW agency's plans for its future rent reform activity and the implementation timeline.</b>	

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

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

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix" of families by family	

size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.

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

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

I.	Evaluations.
No known evaluations.	

## 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.

**Hawaii Public Housing Authority**  
**MTW PHA NAME**

**HI001**  
**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).*

**Robert J. Hall**  
**NAME OF AUTHORIZED OFFICIAL**

**Chairperson**  
**TITLE**



Mar 12, 2024

**SIGNATURE**

**DATE**

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

**HPHA MTW Supplement for FY 24  
Attachment A: Hardship Policies**

**General Hardship Policy**

This general hardship policy establishes how the Hawaii Public Housing Authority (HPHA) will determine when a requirement or provision of an MTW activity constitutes a financial or other hardship for a family. The HPHA shall adopt additional hardship policies specific to individual MTW activities, as needed.

**Definition of Hardship**

A financial or other hardship may include or result from the following situations:

- A family has experienced a decrease in income because of changed circumstances, including the loss or reduction of employment, death in the family, or reduction in or loss of earnings or other assistance;
- A family has experienced an increase in expenses, because of changed circumstances, for medical costs, childcare, transportation, education, or similar items; and
- Such other situations and factors determined by the HPHA to be appropriate.

**Applying for a Hardship Exemption**

To apply for a hardship exemption, a family shall submit a request to the HPHA, in writing, which describes:

- The nature and circumstance of the hardship;
- The expected duration of the hardship; and
- How the hardship has affected or will affect the family's ability to pay rent.

**Determination of Hardship**

Upon receipt of a request for exemption from a required MTW activity, the HPHA shall suspend the activity for the household, beginning the month after the request was made

and until it makes a final determination. In its evaluation of the request, the HPHA shall first determine (1) if the hardship actually exists, and (2) whether nexus can be established between the hardship and the family's claimed inability to pay rent.

The exact criteria the HPHA shall use when evaluating a hardship exemption request shall be established under the applicable activity-specific hardship policy below.

If the HPHA determines that no hardship exists, the HPHA will reinstate the MTW activity for the family and, if applicable, require the family to repay any rent amounts suspended within 30 calendar days after notice is given.

If the HPHA determines that a hardship does exist, the family will be exempted from the MTW activity until the hardship has been resolved or after period of 90 calendar days, whichever comes first. The HPHA may extend the family's exemption beyond 90 calendar days if it determines that the hardship will persist.

### **Notifications**

The HPHA will notify all participant households affected by an MTW activity of their right to request an exemption at intake and/or during the reexamination process. The HPHA's notifications shall also advise households of their rights under the applicable program grievance procedures.

### **Grievance Procedure**

In the event a hardship request is denied, a family may appeal the agency's decision and request an informal hearing pursuant to Chapters 17-2021 and 17-2031 of the Hawaii Administrative Rules (HAR).

### **Reasonable Accommodations**

Reasonable accommodations shall be provided for persons with disabilities in accordance with HPHA's Reasonable Accommodation and Modification Policy (Administrative Memo No. 4).



**MTW Activity 24-06 (Waiver 3.b.)  
Biennial Reexaminations for HCV**

This MTW activity is intended to benefit HCV families and HPHA staff by reducing the overall number of reexaminations performed. Under this activity, the HPHA will NOT limit the number of interim reexaminations a family can request per year. As such, the HPHA anticipates this activity will result in no financial or other hardships because families can still request rent adjustments at any time should they experience a change in income or family composition.

**HPHA MTW Supplement for FY 24**  
**Attachment B: Impact Analyses**

This attachment contains the written analyses of various MTW activities with “impact analysis” requirements. The HPHA shall prepare an impact analysis:

1. Prior to implementation of an MTW activity, required as a safe harbor;
2. For certain activities on an annual basis during the implementation of the activity;
3. Prior to any Safe Harbor Waiver or Agency-Specific Waiver requests; and
4. At the time an MTW activity is closed out if an impact analysis was previously required.

**MTW Activity 24-06 (Waiver 3.b.)  
Biennial Reexaminations for HCV**

**1. Describe the impact on the agency's finances:**

The HPHA believes this activity will be revenue neutral. The reduction in administrative burden for staff may result in a moderate cost savings, but this could be offset by postponing increases to a tenant's share of the rent when/if their income also increases.

**2. Describe the activity's impact on affordability of housing costs for affected households:**

The HPHA believes this activity will have a neutral to positive impact on housing affordability for affected families. One of the goals of this activity is to incentivize work-able families to increase their income between reexaminations. These families can benefit from increased housing affordability. For families with fixed-incomes, the HPHA expects this activity will have no impact on affordability.

**3. Describe the impact on the agency's waitlist(s):**

The HPHA expects this activity will have no impact on the agency's waiting lists.

**4. Describe the impact on the agency's termination rate of households:**

The HPHA expects this activity will have no impact on the termination rate.

**5. Describe the impact on the agency's current occupancy level in public housing and utilization rate in the HCV program:**

The HPHA expects this activity will have no impact on the current utilization rate in the HCV program.

**6. Describe the impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice:**

The HPHA believes this activity will improve the cost effectiveness of the HCV program by freeing up staff to accomplish other tasks and provide additional services to participating families. The HPHA also believe this activity can improve resident self-sufficiency by providing an incentive to increase income between reexaminations. This activity will have no impact on the agency's ability to meet its housing choice goals.

**7. Describe the impact on the agency's ability to meet the MTW statutory requirements:**

The HPHA believes this activity will have no impact on the agency's ability to meet the five MTW statutory requirements.

**8. Describe the impact on the rate of hardship requests and the number granted and denied as a result of this activity:**

The HPHA does not anticipate an increased rate of hardship requests granted or denied. Although this activity allows MTW expansion PHAs to limit the number of interim reexaminations to one per year, the HPHA has opted NOT to establish such a limit.

**9. Across the other factors above, describe the impact on protected classes (and any associated disparate impact):**

The HPHA does not believe this activity will have any negative impact on protected classes. The activity will not change monthly rent amounts or housing affordability for families belonging to protected classes any more than it will for all other families.

### **Public Testimony**

On January 19, 2024, the HPHA published a public hearing notice in the Honolulu Star-Advertiser, The Garden Island, The Maui News, West Hawaii Today, and Hawaii Tribune Herald. A draft of the Amended MTW Supplement for FY 24 was made available at all HPHA AMP offices and on the HPHA's website. A public hearing was held in-person and online on March 4, 2024.

The HPHA received no public testimony or comments on the Amended MTW Supplement for FY 24.