

# PHA Name : Housing Authority & Comm Svcs Of Lane Co

**PHA Code :** OR006

**MTW Supplement for PHA Fiscal Year Beginning :** (MM/DD/YYYY): 10/1/2023

**PHA Program Type:** Combined

**MTW Cohort Number:** Landlord Incentives

**MTW Supplement Submission Type:** Annual Submission

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

MTW Waiver Narratives

March 31, 2023

Introduction

Homes for Good became a Moving to Work (MTW) agency in 2022. As part of its participation in the MTW program, Homes for Good must draft a document each year describing its use of MTW authority. This document, which is known as the MTW Supplement to the PHA Plan, will go through a public process prior to being submitted to HUD for approval.

The Moving to Work Program

Congress created the MTW program in 1996. The MTW allows housing authorities to alter HUD program rules for the Housing Choice Voucher and Public Housing programs. The purpose of the program is to identify policy adjustments and local policy changes that can improve outcomes. MTW agencies represent a small percentage of all housing authorities, but the number is growing: HUD is in the process of adding another one hundred (100) agencies to the program. MTW must ensure that their use of MTW flexibilities meets one or more of the following objectives:

- 1) Increase affordable housing choices,
- 2) Increase cost effectiveness, and/or
- 3) Promote self-sufficiency.

MTW Waivers

Each MTW agency must tell HUD and the public which policies it plans to waive and why. This happens through the agency's annual planning process. HUD has some standard waivers that MTW agencies may choose to use, or MTW agencies can design their own waivers based on local needs. These are known as "agency-specific" waivers. For its first year in the MTW program, Homes for Good has selected seven (7) standard waivers and one (1) agency-specific waiver to implement. These waivers are described below.

Homes for Good Waivers

Rent Reasonableness 3rd Party Requirement

Homes for Good proposes eliminating the requirement to use a third-party to perform rent-reasonableness determinations for units and properties that Homes for Good owns. Rent reasonableness is a process that housing authorities use to determine whether a rent is reasonable before entering into a contract with the landlord or approving a rent increase. Housing authorities are typically not allowed to perform rent reasonableness on units that the agency owns and are required to hire a third-party to do this work.

Procuring and overseeing a third-party contractor for rent reasonableness is costly and time-consuming for the agency. Instead, Homes for Good will apply its current rent reasonableness process for units it does not own or manage to units it does own or manage. This process has adequate controls in place to ensure uniformity, auditability, and transparency of the determination.

While the intention of the HUD rule is to ensure impartiality in rent reasonableness decisions, the third-party software used by Homes for Good bases its results on objective measures, reducing the risk of impartiality.

Alternative Reexamination Schedule

Homes for Good proposes to implement triennial reexamination schedule for certain Housing Choice Voucher (HCV) households. This policy will apply to all HCV households other than those in the Homeownership or Foster Youth Initiative (FYI) programs. Under the new policy, households in the HCV program will have a reexamination once every three (3) years unless their household income decreases. As part of this policy change, the following policy decisions were made:

1. Approved rent increases will use the most current payment standard.
2. Homes for Good will only conduct a reexamination when an adult household member is added and not when a minor household is added.
3. If a family moves into a new unit, a full reexamination will be conducted, and the household's reexamination schedule will be reset.

This standard waiver is dependent on Homes for Good's implementation of a new software system that can generate and submit required information to HUD. Homes for Good's current software is unable to do this and so implementation of this activity will need to wait until a new software is in place. The move to the new software could take up to two (2) years.

Once this policy is in place, it will benefit both the client and the agency by reducing the burden of the regular review cycle. As part of the approval process, Homes for Good has conducted an impact analysis. Based on this analysis, households will only see a positive impact due to this change. Homes for Good also confirmed that there is not a significant disparate impact based on demographic.

Pre-Qualifying Unit Inspections

Homes for Good's recent landlord outreach revealed a desire among landlords to reduce the time it takes to approve units for

the HCV program. Inspections for new move-ins typically happen once the unit is approved but prior to the tenant moving into the unit. Since the scheduling of the inspection and the potential for failures and re-inspections takes time, the current process can delay the move-in. By pre-qualifying unit inspections, Homes for Good will be able to perform the inspection earlier in the process. This will enable the household to move into the unit as soon as it is approved.

#### Third-Party Requirement for PBV Inspections

Homes for Good proposes to eliminate the requirement that the agency use a third-party entity to perform inspections on units and properties it owns. Procuring and overseeing a third-party contractor for inspection services is costly and time-consuming for the agency. Instead, Homes for Good will utilize its in-house inspection team and the policies and procedures governing inspections for the HCV program. The inspection process has built-in quality control measures in place that will help to ensure all inspections performed by Homes for Good are fair and that the process is transparent and auditable.

#### Alternative Inspection Schedule

Currently, Homes for Good inspects its HCV units every two (2) years. HFG proposes changing the policy so that it only inspects units every three (3) years. This policy change will give inspectors more time for pre-inspections, re-inspections, and responding to special inspection requests. Homes for Good expects that this will allow inspectors to complete inspections sooner. This will reduce the amount of time it takes to lease up units, process unit transfers, and reinspect units that failed inspection. In addition, Homes for Good hired a full-time Landlord Educator. This position will 1) work with tenants over concerns regarding their existing housing and, 2) work with landlords to address concerns and help them better understand Homes for Good is confident that concerns that arise between inspections will be addressed through outreach and education.

#### Eliminate PBV Selection Process for PHA-Owned Properties

Homes for Good proposes eliminating the requirement that the agency engage in a selection process when awarding project-based vouchers to properties it owns or controls. This will allow Homes for Good to award project-based vouchers to non-Public Housing properties it owns without a selection process. This policy change will help to streamline the development of new affordable housing units in the County. This change does not impact other HUD-required selection requirements and the agency will ensure that the process to award vouchers is uniform and transparent.

#### Limit Portability for PBV

HFG proposes waiving the requirement that it provide a tenant-based voucher to project-based voucher (PBV) households after being on a PBV for twelve (12) months. Homes for Good's Permanent Supportive Housing (PSH) projects will use a referral from an approved entity instead of offering a tenant-based voucher to everyone after twelve (12) months of occupancy. The overall timeframe for access to the tenant based voucher is amended to allow for tenant based vouchers to be provided before 12 months or after 24 months, but no longer than 36 months. This policy change does not apply to non-PSH PBV projects.

Waiving the portability requirement will:

- Decrease the paperwork that it initiated by PSH-PBV clients who state they want to move but are not ready to move, and then withdraw their request to move.
- Approved entities will work with households who are using PSH-PBV to support them in becoming successful in the private rental market. By implementing a better system for PSH-PBV clients who express interest in moving, we aim to reduce the amount of paperwork generated when clients change their minds about moving. This can be achieved by providing support and resources to help them make informed decisions and be prepared for the private rental market. Changing this process will not only save time and resources, but also improve overall client satisfaction and engagement with the program.

#### Self-Certification of Exception Payment Standards

Currently, Homes for Good is required to ask HUD's approval in order to apply an exception payment standard (EPS). An EPS is any payment standard above 110% of the Fair Market Rent (FMR). Instead, Homes for Good proposes allowing it to self-certify EPS's in the case of reasonable accommodation. This will increase the housing opportunities of HCV Program participants needing accessibility features requiring a reasonable accommodation.

The current process to approve EPS's through the field office is time consuming and burdensome for the family, the housing agency, and HUD. In some instances, the unit becomes unavailable while Homes for Good is waiting for HUD's approval. Units with accessibility features typically have significantly higher rents and, without an expedited approval of the EPS, households with accessibility needs are severely limited in their housing options.

**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)	Plan to Implement in the Submission Year
<b>3. Reexaminations</b>	
a. Alternative Reexamination Schedule for Households (PH)	Plan to Implement in the Submission Year
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)	Not Currently Implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Not Currently Implemented
<b>5. Housing Quality Standards (HQS)</b>	
a. Pre-Qualifying Unit Inspections (HCV)	Plan to Implement in the Submission Year
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
d. Alternative Inspection Schedule (HCV)	Plan to Implement in the Submission Year
<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)	Plan to Implement in the Submission Year
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)	Plan to Implement in the Submission Year
<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	Not Currently Implemented

**C. MTW Activities Plan that Housing Authority & Comm Svcs Of Lane Co Plans to Implement in the Submission Year or Is Currently Implementing**

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

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

Homes for Good proposes waiving certain provisions of 24 CFR 982.352(b) and 983.303, eliminating the requirement that the PHA use a third-party entity to perform rent-reasonableness determinations for units and properties the agency owns, manages, or controls.

Procuring and overseeing a third-party contractor for rent reasonableness is costly and time-consuming for the agency. Instead, Homes for Good will apply its current rent reasonableness process for non-owned/managed units to units it owns and manages. This process has adequate controls in place to ensure uniformity, auditability, transparency, and fairness of the determination.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

N/A. This is our first submission

**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 request is being submitted for review with this submission of the MTW Supplement (see Section D).

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

No document is attached.

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

No document is attached.

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

<b>What is the recertification schedule?</b>
<b>How many interim recertifications per year may a household request?</b>
<b>Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.</b>

**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**

Homes for Good proposes waiving certain provisions of the following policies:  
- Sections 3(a)(1), 3(a)(2)(E), and 8(o)(5) of the 1937 Act  
- 24 CFR Parts 960.257(a)-(b), 982.516(a)(1) and 982.516(c)(2)

Waiving these provisions will allow Homes for Good to implement a triennial recertification policy for all households in both its Public Housing and Housing Choice Voucher programs. This will benefit the client and the PHA by reducing the burden of the regular review cycle.

Homes for Good is in the process of procuring new housing management software that will be a better fit for the agency and allow it to implement the MTW activities detailed in this plan supplement more effectively. The agency anticipates that the selection and implementation of the new software will take two (2) years. Homes for Good proposes aligning the implementation of the triennial recertifications with the implementation of the new system, allowing it to pause the recertification cycle for all households until the new software is in place. Due to substantial limitations in the current software system, Homes for Good believes that this is the most reasonable and cost-effective approach to both the software implementation and the implementation of its MTW activities.

To address changes in household circumstances, Homes for Good will continue to allow interims for households per its interim policies described at the end of the waiver.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

N/A. This is our first submission

**Does this MTW activity require a hardship policy?**

Yes

This document is attached.

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

No

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

No
<b>How many hardship requests have been received associated with this activity in the past year?</b> No hardship were requested in the most recent fiscal year.
<b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b> Yes
<b>What is the status of the Safe Harbor Waiver request?</b> The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).
<b>Does the MTW activity require an impact analysis?</b> Yes  This document is attached.
<b>Does the impact analysis apply to more than this MTW activity?</b> No
<b>What is the recertification schedule?</b> Once every three years
<b>How many interim recertifications per year may a household request?</b> 2 or more
<b>Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.</b>  Changes in household members and/or income reductions, the family will be able to request an interim down. Changes that increase a tenant's income, those changes will be captured at the re-exam.

<b>5.a. - Pre-Qualifying Unit Inspections (HCV)</b>
<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> As part of the requirements of the Landlord Incentive cohort, Homes for Good (HFG) must select two (2) MTW activities related to landlord incentives in its initial plan year. One of the activities HFG selected is Waiver 5.a, Pre-Qualifying Unit Inspections.  HFG's landlord outreach revealed a strong desire among landlords to reduce the time it takes to approve the Request for Tenancy Approval (RFTA) during the lease-up process. Inspections for new move-ins typically happen once the RFTA is approved but prior to the tenant moving into the unit. Since the scheduling of the inspection and the potential for failures and re-inspections takes time, the current process can delay the move-in. The Pre-Qualifying Unit Inspections MTW activity will allow HFG to perform the inspection earlier in the process, enabling the household to move into the unit once the RFTA is approved.
<b>Which of the MTW statutory objectives does this MTW activity serve?</b> Housing choice
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b>



Increased expenditures
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b>
The MTW activity applies only to a subset or subsets of assisted households
<b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b>
New admissions (i.e., applicants) only
<b>Does the MTW activity apply to all family types or only to selected family types?</b>
The MTW activity applies to all family types
<b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b>
The MTW activity applies to all tenant-based units
<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>
N/A. This is our first submission.
<b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b>
Yes
<b>What is the status of the Safe Harbor Waiver request?</b>
The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).
<b>How long is the pre-inspection valid for?</b>
The pre-inspection is valid for 90 days.

<b>5.c. - Third-Party Requirement (HCV)</b>
<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>
Homes for Good proposes waiving certain provisions of Section 8(o)(11) of the 1937 Act, 24 CFR Part 982.352(b)(iv), and 24 CFR Part 983.103(f). Waiving these provisions will allow Homes for Good to eliminate the requirement that the PHA use a third-party entity to perform Housing Quality Standard (HQS) inspections on units and properties the agency owns, manages, or controls.
Procuring and overseeing a third-party contractor for HQS inspections services is costly and time-consuming for the agency. Instead, Homes for Good will utilize its in-house HQS inspection team and the policies and procedures governing HQS inspections for the Housing Choice Voucher program. The HQS inspection process has built-in quality control measures in place that will help to ensure the inspections performed at properties owned or managed by Homes for Good are uniform fair and that the process is transparent and auditable.
<b>Which of the MTW statutory objectives does this MTW activity serve?</b>
Cost effectiveness
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b>

Increased revenue; Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies to all family types

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

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

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

N/A. This is our first submission.

**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 request is being submitted for review with this submission of the MTW Supplement (see Section D).

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

Following will explain the quality assurance method

Will comply with the standards of SEMAP for quality assurance.

This document is attached.

#### **5.d. - Alternative Inspection Schedule (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**

As part of the requirements of the Landlord Incentive cohort, Homes for Good (HFG) must select two (2) MTW activities related to landlord incentives in its initial plan year. One of the activities HFG selected is Waiver 5.d, Alternative Inspection Schedule.

Implementing an alternative schedule for Housing Quality Standard (HQS) inspections would increase inspector bandwidth for performing pre-inspections, re-inspections, and responding timeline to special inspection requests. HFG estimates that the increased bandwidth would allow inspectors to complete HQS inspections within 1-2 business days of the landlord contacting HFG.

This activity will allow HFG to inspect its HCV units every three (3) years instead of annually or biennially. In lieu of the regular annual or biennial inspection, HFG hired a full-time Landlord Liaison to

- 1) Field calls from applicants and tenants who are searching for housing,
- 2) Work with tenants who have concerns or questions regarding their existing housing,
- 3) Work with landlords to address concerns and understand the housing standards each unit must meet.

With a Landlord Liaison on staff, HFG is confident that HQS concerns and/or questions that may arise between inspections will be addressed through landlord and tenant outreach or special inspections, as both tenants and landlords have a dedicated communication channel to voice concerns.

**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.**

N/A. This is our first submission

**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 request is being submitted for review with this submission of the MTW Supplement (see Section D).

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

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

Homes for Good proposes waiving certain provisions of 24 CFR Part 983.51 as superseded by HOTMA Implementation Notices at 82 FR 5458 and 82 FR 32461. These waivers will allow Homes for Good to award project-based vouchers to non-Public Housing properties it owns without a selection process and without engaging in an initiative to improve, develop, or replace a Public Housing property or site. This waiver does not apply to other HUD-required selection requirements and the agency will ensure that the process to award vouchers is uniform and transparent.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

N/A. This is our first submission

**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 request is being submitted for review with this submission of the MTW Supplement (see Section D).

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

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

The Lane County Housing Authority (LCHA) (aka Homes for Good) requests to waive a safe harbor requirement under MTW Waiver 9.h., Limit Portability for PBV Unit. Under the activity, certain provisions of Section 8(o)(13)(E) of the 1937 Act and 24 C.F.R. Part 983.261 are waived allowing agencies to waive the requirement of providing a tenant-based voucher at 12 months when requested by a PBV household. As a safe harbor to the activity, portability cannot be restricted for more than 24 months. LCHA is seeking to waive this safe harbor and restrict mobility for its Permanent Supportive Housing PBV households with respect to a household's readiness to move. LCHA intends to offer portability to PSH PBV via a local preference based on scoring under LCHA's Move On assessment tool. Under this framework the overall timeframe for access to the tenant-based voucher is amended to allow for TBVs to be provided before 12 months or after 24 months, but no longer than 36 months.

Waiving the portability requirement will lower the cost of turning units for households moving to a tenant-based voucher, help the PBV project to cashflow by continuing to assist households, decrease the administrative burden associated with program unit transfers, and ensure that households on LCHA waitlists are offered a tenant-based voucher first.

**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.**

Increased revenue; Decreased expenditures

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

The MTW activity applies 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?**

Currently assisted households only

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

The MTW activity applies only to selected family types

**Please select the family types subject to this MTW activity.**

Other – another specifically defined target population or populations.

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

Families living in Permanent Supportive Housing Project Based Voucher Units

**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.**

Only applies to families living in Permanent Supportive Housing Project Based Voucher 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.**

N/A. This is our first submission

**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 request is being submitted for review with this submission of the MTW Supplement (see Section D).

<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>Yes, the Safe Harbor Waiver request(s) for 2d, 3b, 5a, 5c, 5d, 9c, 9h is(are) attached.</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</p>

E.2	<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> No</p>

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2022	\$2,106,617	\$2,106,617	\$0	
2023	\$1,710,993	\$1,515,064	\$195,929	

<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	0
	49%-30% Area Median Income	0
	Below 30% Area Median Income	0
	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> Yes	

<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.	0 # of unit months
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	0 # of unit months

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

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

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 (DD/MM/YYYY), 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 identity, 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.

**Homes for Good**

*MTW PHA NAME*

**OR006**

*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).*

**Heather Buch**

*NAME OF AUTHORIZED OFFICIAL*

**Board Vice-Chair**

*TITLE*

*Heather Hannah Buch*

Heather Hannah Buch (Jun 28, 2023 15:07 PDT)

*SIGNATURE*

**6/28/23**

*DATE*

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

IN THE BOARD OF COMMISSIONERS OF THE  
HOMES FOR GOOD HOUSING AGENCY, OF LANE COUNTY OREGON

ORDER 23-28-06-04H

In the Matter of Approving the Submission of  
the PHA FY2024 Move to Work Supplement  
Plan and MTW Certifications of Compliance.

WHEREAS, Homes for Good has entered into a Moving to Work Amendment to Annual Contributions Contract on May 5, 2022.

WHEREAS, Homes for Good is required to submit a Move to Work Supplement Plan with its Public Housing Agency Annual Plan.

WHEREAS, Homes for Good is required to submit the MTW Certifications of Compliance

WHEREAS, Homes for Good has worked with RAB to ensure adequate involvement.

WHEREAS, Homes for Good completed the required public hearing process.

WHEREAS, Homes for Good is permitted to implement waivers as a Moving to Work Public Housing Agency.

WHEREAS, Homes for Good is required to submit the board approved Moving to Work Supplement Plan to HUD for approval.

NOW IT IS THEREFORE ORDERED THAT:

The Move to Work Supplement Plan be approved, and added as a supplement document to the Administrative Plan for FY2024.

The MTW Certifications of Compliance be approved.

DATED this 28th day of June, 2023

Heather Hannah Buch  
Heather Hannah Buch (Jun 28, 2023 15:07 PDT)

Vice-Chair, Homes for Good Board of Commissioners



Secretary, Homes for Good Board of Commissioners

We did not receive any public comment during our public hearing process

# Impact Analysis for Waiver 3.b Alternative Reexamination Schedule for Households (HCV)

June 9, 2023

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## Description of the Waiver

Homes for Good proposes to implement a triennial reexamination schedule for all Housing Choice Voucher (HCV) households other than those in the Homeownership or Foster Youth Initiative (FYI) programs. Under this waiver, households in the HCV program will have a reexamination once every three (3) years. As part of this policy change, the following policy decisions were made:

1. Approved rent increases will use an interim 50058 and will apply the most current payment standard.
2. Homes for Good will conduct an interim reexamination when an adult household member is added and not when a minor household is added.
3. If a family moves into a new unit, a full reexamination will be conducted, and the household’s reexamination schedule will be reset.

This standard waiver is dependent on Homes for Good implementation of a new software system that can generate and submit the HUD Expansion 50058. Homes for Good current software is unable to generate the Expansion 50058, which will be required for implementing this activity.

### Definitions Used in this Analysis

- **Work able:** household does not receive an elderly/disabled allowance.
- **Race and ethnicity:** race and ethnicity applies to the head of household only, not other individual household members.
- **Large families:** a family of four (4) or more members.
- **ELI:** Extremely Low Income, equal to 30% or less of the area median income
- **VLI:** Very Low Income, equal to income between 30% and 50% of the area median income
- **LI:** Low Income, equal to income between 50% and 80% of the area median income

### Impact Analysis Method

The Homes for Good team first selected the metrics to review based on anticipated impact of the waiver. The chart below shows the metrics and the method for analysis. The results of these data points informed the other subsequent analysis of the impact on the agency’s finances and households by demographic and will help Homes for Good to set a baseline for analyzing the impact of this activity in the future.

Data Point	Data Analysis Method
Number of fixed income households	Review most recent 50058 data
Number of work able households	Review most recent 50058 data
Number of near-elderly households (will turn 62 in next three years)	Review most recent 50058 data
Annual staff time in hours to process recertifications (no interims)	Staff survey, timing exercises, other means
Annual postage cost to mail certification documents to households (if applicable and no interims)	HAB Financial Statement
Average number of interims due to decrease in income over last 3 years.	Review of last 3 years of 50058 data
Average number of interims due to decrease in income over last 3 years for fixed income households. Decreased in income or increase in expenses.	Review of last 3 years of 50058 data
Average decrease in income for interims downs	Review of last 3 years of 50058 data

Data Point	Data Analysis Method
Average tenant rent decrease for interim downs	Last 3 years of 50058 data exported from HAB or HAB report showing this information
Average decrease in income for interims downs (fixed income)	Review of last 3 years of 50058 data
Average tenant rent decrease for interim downs (fixed income)	Review of last 3 years of 50058 data
Number of zero-income households	Review most recent 50058 data
Number of work able households with no earned income	Review most recent 50058 data
Number of work able households with income from a temporary source (TANF, GA, child support, unemployment, other non-wage)	Review most recent 50058 data
Number of households with 1 or more members who will turn 18 within the next 3 years	Review most recent 50058 data

These metrics were assigned to members of the project team, who then gathered the required data elements. Next, an in-depth analysis was performed using 50058 data from the last three (3) years. The goal of the analysis is to identify the following:

1. Financial impact to the agency
2. Disparate impact based on demographics

Answers to the other impact analysis questions were derived from these analyses. Note that Homes for Good does not anticipate the policy changes to have a negative impact on any specific households, but instead measured the positive impact to identify cases where certain groups were impacted more positively than others. The analysis confirmed that there will not be a negative impact to the families currently on program. However, the analysis also shows that fewer families may be able to be served in the future due to these changes.

## Results

### Data Point used in the Analysis

The chart below shows the results for the original data points measured.

Data Point	Result
Number of fixed income households	2,603
Number of work able households	978
Number of near-elderly households (will turn 62 in next three years)	327



Data Point	Result
Annual staff time in hours to process recertifications (no interims) – includes houses spent on hearings for missing paperwork, processing follow-up letters, etc.	737.25 Hours per month
Annual postage cost to mail certification documents to households (if applicable and no interims)	\$12,805.58
Average number of interims due to decrease in income over last 3 years.	531
Average number of interims due to decrease in income over last 3 years for fixed income households. Decreased in income or increase in expenses.	201
Average decrease in income for interims downs (per year)	\$10,900.00
Average tenant rent decrease for interim downs (per month)	\$220.00
Average decrease in income for interims downs (fixed income – per year)	\$8,808.00
Average tenant rent decrease for interim downs (fixed income – per month)	\$187.00
Number of zero-income households	170
Number of work able households with no earned income	520
Number of work able households with income from a temporary source (TANF, GA, child support, unemployment, other non-wage)	493
Number of households with 1 or more members who will turn 18 within the next 3 years	427

### Financial Impact to the Agency

Based on its analysis, Homes for Good determined that this policy change will have a negative impact to the agency’s HAP expenses, increasing annual HAP expenditures by \$1,199,938 per year, a 3% increase. This is measured by looking at the increases in income that has been processed over the last three years and the associated increase in rent and decrease in HAP. By changing the review cycle to every three (3) years, the incremental decreases in HAP expense will not be realized. The chart below shows a summary of this analysis.

Metric	All HH's	Formula	Questions / Comments	
- Control: Number of Annuals Last 3 Years	10,455		"Annuals" also includes move ins and port ins; limited to VO program only	
a. Avg Increase in Income Last 3 Years	\$3,845			
b. Number of Households with Increase in Income Last 3 Years	5,615			
c. Reduction in HAP due to Income Increases Last 3 Years	\$4,626,228			
d. Number of Interim Ups Last 3 Years	445			
e. Avg Cost to Process Interim	\$27			
f. Avg Cost to Process Annual	\$135			
g. Total Annual Cost to Process Interim Ups	\$3,935	$(d \times e) / 3$		
h. Number of Interim Downs Last 3 Years	1,433			
i. Average Number of Interims Last 3 Years	2,182			This includes interims that are the first record in the dataset, meaning we don't know if they were an up or down. They are included in this number but not in either d or g.
j. Estimated Number of Interims Under New Policy	478	$h / 3$		
k. Average Number of Annuals Last 3 Years	3,008			
l. Estimated Number of Annuals Under New Policy	1,003	$k / 3$		
m. Total Annual Reduction in Number of Reviews Under New Policy	3,710	$(k - l) + (i - j)$		
n. Cost Savings Due to Reduction in Reviews	\$342,138	$(f \times (k - l)) + (e \times (i - j)) + \text{Postage}$		
o. Total Annual Cost Savings (Loss)	-\$1,199,938	$n - (c / 3)$		

## Demographic Impact

To measure the demographic impact, Homes for Good looked at the number of income increases over the last three (3) years by demographic group, including race, ethnicity, large families, elderly, income level, and disabled households. Race and ethnicity data is based on the head of household only. This assessment was done for all HCV households, work able households with an increase in any type of income, and work able households with an increase in earned income. The results shown in the chart below confirm the assumptions made by the team:

1. No households will see a negative impact due to this policy change, so the analysis shows which households had a more positive impact than others;
2. Large households would have more increases in income and those increases would be larger than other groups since there are more household members to earn income and a larger household to sustain;
3. Elderly and disabled households saw increases in income, but this was mainly due to fixed income increases and the amounts were marginal;
4. There was not a significant difference in the impact on households based on race or ethnicity and the most disproportionate impact (Native Hawaiian/Pacific Islander) is likely due to the small number of households in that group.
5. The higher a household's income is, the more likely they are to have an increase in income and higher the increase in income is likely to be.

Metric	Asian	African American	Native HI/Pacific	Native Amer.	White	Hispanic	Non-Hispanic	Large Family	Disabled	Elderly	ELI	VLI	LI	Formula
a. Total Population (# annuals/move-ins last 3 years)	154	579	91	665	9,702	826	9,631	1,418	6,712	3,129	8,755	1,364	298	
b. Households with Increase in Income Last 3 Years	81	295	44	346	5,214	404	5,211	693	3,949	2,004	4,434	907	241	
c. Percent of Population with Increase	53%	51%	48%	52%	54%	49%	54%	49%	59%	64%	51%	66%	81%	b / a
d. Average Income Increase	\$4,193	\$5,008	\$8,899	\$4,731	\$3,798	\$5,338	\$3,729	\$9,926	\$2,164	\$1,520	\$2,060.20	\$6,996.49	\$18,930.29	
e. Total Work Able Population (# annuals/move-ins last 3 years)	43	240	38	203	2,758	390	2,611	1,039	0	0	2,370	442	164	
f. Work Able Households with Increase in Income Last 3 Years	20	97	17	78	1,138	156	1,086	477	0	0	806	287	129	
g. Percent of Population with Increase - Work Able	47%	40%	45%	38%	41%	40%	42%	46%	0%	0%	34%	65%	79%	f / e
h. Average Income Increase - Work Able	\$9,609	\$9,502	\$8,825	\$10,434	\$9,466	\$7,776	\$9,683	\$11,043	\$0	\$0	\$5,766	\$12,298	\$20,837	
j. Work Able Households with Increase in Earned Income Last 3 Years	8	40	4	46	534	88	493	240	0	0	328	157	78	
k. Percent of Work Able HH's with Increase in Earned Income	19%	17%	11%	23%	19%	23%	19%	23%	0%	0%	14%	36%	48%	j / e

### Other Impact Analysis Questions

Below are answers to the additional impact analysis questions identified in the MTW Operations Notice.

#	Question	Answer
1	Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)	While there is a chance that one or more families becomes over-income and remain housed (see question 2 below), Homes for Good anticipates any impact to the waitlist or the amount of time families on the waitlist to be inconsequential.
2	Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)	Homes for Good anticipates that this policy change could result in a family becoming over-income and remaining on program until the next review. This would most likely impact Low Income households, whose increases in income were the largest over the last three years (\$18,930 vs. \$2,060 for ELI families). These households only represent only 3% of the total population, so the rate of occurrence will be minimal.
3	Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program	With a reduction in HAP, Homes for Good may see a slight reduction in utilization due to this policy change. However, the agency will still meet its Substantially the Same (STS) requirement and the reduction in households served will be offset by future MTW policy changes.
4	Impact on meeting the MTW statutory goals of cost effectiveness, self sufficiency, and/or housing choice	Cost effectiveness Homes for Good's analysis shows that by reducing the number of annuals and interims, this policy change will save the agency \$342,000 per year in administrative expenses
		Self-sufficiency Homes for Good believes that allowing households to increase their income without an impact on rent will encourage households to increase their income and work to become self-sufficient
		Housing choice Homes for Good does not anticipate any impact on housing choice

#	Question	Answer	
5	Impact on the agency's ability to meet the MTW statutory requirements	1. Ensure that 75% of newly assisted households have very low incomes	Homes for Good will continue to use its current admissions policies, ensuring that this requirement is met.
		2. Establish a reasonable rent policy that encourages employment and self-sufficiency	While this policy is not a rent change policy, Homes for Good believes that allowing households to increase their income without an impact on rent will encourage households to increase their income.
		3. Continue to assist substantially the same number of households	With a reduction in HAP, Homes for Good will be able to serve 85 fewer households. The agency will still meet its STS requirement and the reduction in households served will be offset by future MTW policy changes.
		4. Continue to assist a comparable mix of households by family size	This policy will not have an impact on the household size of households served, although the analysis has shown that larger households will see more benefit from this policy change than small households.
		5. Meet Housing Quality Standards requirements	This policy change will not have any impact on HQS.
6	Impact on the rate of hardship requests and the number granted and denied as a result of this activity	Homes for Good does not anticipate any hardships as a result of this policy change as it will not have a negative impact on household's rent or utility payments.	

## Conclusions

Homes for Good recognizes that the change to reexamination frequency will have a negative impact on the funds it has available to house families in the HCV program. However, the agency also recognizes that the positive impact that this change will have on households could be significant and the increase in HAP expenditures can be offset by reduced administrative costs and other policy choices that the agency will be considering prior to the next MTW planning cycle. Homes for Good will also explore other MTW options available in Yardi for offsetting the losses related to the implementation of the triennial recertification waiver.

Homes for Good Housing Agency (OR006) has not established a hardship policy.

It is the intent of our PHA to implement an alternative re-exam schedule. However, we are currently engaged in a software conversion from HAB to Yardi.

Yardi has established hardship policies built into its software.

Upon the full software conversion, slated to be complete by end of CY2023, our PHA will work with Yardi to explore/vet/decide upon a hardship policy.

At that time, we will then make a modification request to our MTW Supplement Plan.

As of this time, our intent is to declare that we desire to move to an alternative re-exam schedule but not implement it.

Homes for Good Housing Agency (OR006) will utilize SEMAP standards in ensuring compliance with Third-Party Requirement (HCV)

# Waivers for Year 1 MTW Supplement

Waiver	Limit Portability for PBV (9.h)	
Narrative	<p><i>The Lane County Housing Authority (LCHA) (aka Homes for Good) requests to waive a safe harbor requirement under MTW Waiver 9.h., Limit Portability for PBV Unit. Under the activity, certain provisions of Section 8(o)(13)(E) of the 1937 Act and 24 C.F.R. Part 983.261 are waived allowing agencies to waive the requirement of providing a tenant-based voucher at 12 months when requested by a PBV household. As a safe harbor to the activity, portability cannot be restricted for more than 24 months. LCHA is seeking to waive this safe harbor and restrict mobility for its Permanent Supportive Housing PBV households with respect to a household’s readiness to move. LCHA intends to offer portability to PSH PBV via a local preference based on scoring under LCHA’s Move On assessment tool. Under this framework the overall timeframe for access to the tenant-based voucher is amended to allow for TBVs to be provided before 12 months or after 24 months, but no longer than 36 months.</i></p> <p><i>Waiving the portability requirement will lower the cost of turning units for households moving to a tenant-based voucher, help the PBV project to cashflow by continuing to assist households, decrease the administrative burden associated with program unit transfers, and ensure that households on LCHA waitlists are offered a tenant-based voucher first.</i></p>	
MTW Statutory Objectives	X	Cost effectiveness
		Self-sufficiency
		Housing choice
Cost Implications		Neutral (no cost implications)
	X	Increase revenue
		Decrease revenue
		Increase expenditures
	X	Decrease expenditures
Applicability	This waiver only applies to households in Homes for Good’s Permanent Supportive Housing program.	
Safe Harbor Waiver	<p>Homes for Good requests to waive the following safe harbor. Detailed information related to this safe harbor waiver request are included in Section D of the MTW Supplement to the PHA Plan.</p> <p>i. Portability under this activity must not be restricted for more than 24 months.</p>	

	<p>Homes for Good not request to waive any other safe harbors related to this waiver and will operate within the following safe harbors:</p> <ul style="list-style-type: none"> <li>i. The agency must have a clear and uniform policy in place to address how move requests are received and how they are approved/denied for PBV households.*</li> <li>ii. Participants must still retain the ability to request a tenant-based voucher for reasonable accommodation according to existing rules.*</li> </ul>
Hardship Policy	This waiver does not require a hardship policy.
Impact Analysis	This waiver does not require an impact analysis.