

PHA Name : Housing Authority & Comm Svcs Of Lane Co

PHA Code : OR006

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 10/1/2024

PHA Program Type: Combined

MTW Cohort Number: Landlord Incentives

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

Homes for Good has a strong commitment and track record for bringing collaborative and innovative projects to the community. With its initial MTW Supplement to the PHA Plan ("MTW Supplement"), Homes for Good used its MTW flexibility to align the needs of the community and residents with the three (3) MTW Statutory Objectives in ways that help transform operations, encourage self-sufficiency, and better utilize the funding it receives.

Cost Effectiveness: Homes for Good is dedicated to exploring MTW flexibility options such as implementing triennial reviews and eliminating deductions and/or modifying the HQS inspection schedule. Some of the waivers associated with cost effectiveness have already been implemented or will be implemented in the next Fiscal Year. Waivers related to cost-effectiveness allow Homes for Good to redirect staff time and resources toward activities that have a higher value for the participant and the community.

Self-Sufficiency: Homes for Good envisions the agency automatically enrolling households into its Self-Sufficiency Program upon participant entry, resulting in a dramatic increase in participation. While this year's MTW Supplement does not include modifications to the FSS program, Homes for Good plans to work internally to design the program and select the appropriate waivers in the future.

Housing Choice: Homes for Good is dedicated to exploring mortgage assistance and expanded homeownership programs. We believe homeownership is a key element in ending generational poverty. Homes for Good is also interested in increasing utilization of project-based vouchers. During FY2023, Homes for Good implemented several waivers that help streamline the use of project-based vouchers.

As a member of the Landlord Incentives cohort of the Moving to Work program, Homes for Good implemented Pre-Qualifying Unit Inspections and Alternate Inspection Schedule. These are described in more detail in Section C of the MTW Supplement.

Homes for Good implemented other MTW flexibilities in its first year as an MTW agency as well. The activities selected for the year were prioritized using the following three objectives:

1. Reallocate resources to reduce paperwork and refocus staff efforts on navigation and prevention;
2. Serve the greatest number of households possible through new affordable housing and housing service programs that help individuals in need and communities thrive; and
3. Activities implemented will further Homes for Good's Strategic Equity Plan by creating pathways to self-sufficiency and leading and growing ethically.

All activities entered into the FY24 MTW Supplement have been implemented except for the alternative reexamination schedule (waivers 3a and 3b). Homes for Good decided to amend its application of the alternative reexamination schedule based on several factors, including the projected financial impact of the activity and conformity with the agency's new housing and voucher management system, Yardi. This waiver is described in more detail in Section C of the MTW Supplement and the corresponding impact analysis.

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

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

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

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

2.b. - Payment Standards- Fair Market Rents (HCV)

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

Homes for Good will use this waiver to allow the PHA to self-certify exception payment standards (EPS) in the case of reasonable accommodation. This waiver will increase the housing opportunities of our HCV Program participants needing accessibility features requiring a reasonable accommodation.

EPS's are those that are above 120% and currently require approval of the HUD field office. Homes for Good proposes using its MTW flexibility to allow it to self-certify EPS's (up to 150% of FMR) in the case of 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, and many times while approval was pending, the unit becomes unavailable. 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.

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 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.

This waiver will impact households with approved reasonable accommodations in the Housing Choice Voucher program who are searching for units with accessibility features.

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.

N/A - not currently implemented

Does this MTW activity require a hardship policy?

Yes

This document is attached.

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

Yes

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

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

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

No

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

No hardship were requested in the most recent fiscal year.

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

Yes

What is the status of the Safe Harbor Waiver request?

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

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

No

Please explain the payment standards by FMR:

EPS's are those that are above 120% and currently require approval of the HUD field office. Homes for Good proposes using its MTW flexibility to allow it to self-certify EPS's (up to 150% of FMR) in the case of a reasonable accommodation.

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 will use this waiver to eliminate 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.

Rent Reasonableness is now being completed in a more timely manner, allowing the PHA to quickly updated tenants and owners of new rent portions when contract rents are revised under mid year rent increase requests by owners. For the time frame of 10/01/23 - 07/16/24 we have completed 12 PBV Rent Increases and 15 Tenant based rent increases utilizing PHA staff, totaling a savings of \$945.00

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

No

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

Quality assurance is built into Homes for Goods process because the agency uses a third-party app that bases its results on objective measures. The comparables provided to establish rent reasonableness are documented within each tenant file.

No document is attached.

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

Homes for Good will continue to use Nelrod's EZ Reasonable Rent Determinations (EZRRD) software to perform rent reasonableness determinations. EZRRD uses its five-method analysis system to compare multiple features per unit for a more in-depth analysis, and automatically identifies the three best comparables based on the system's objective market analysis.

No document is attached.

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

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

Homes for Good will implement a triennial recertification policy for elderly and disabled 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 plans to implement this policy in the Housing Choice Voucher program first, then implement in the Public Housing program the following year.

In lieu of an annual certification, elderly and disabled households will receive an automatic adjustment to their income by the Cost-of-Living-Adjustment (COLA) factor used by the Social Security Administration (SSA). SSA's COLA adjustments will be posted here prior to the beginning of each calendar year: <https://www.ssa.gov/cola/>.

Waiving these provisions will allow Homes for Good to implement a triennial recertification policy for elderly and disabled

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 plans to implement this policy in the Housing Choice Voucher program first, then implement in the Public Housing program the following year.

In lieu of an annual certification, elderly and disabled households will receive an automatic adjustment to their income by the Cost-of-Living-Adjustment (COLA) factor used by the Social Security Administration (SSA). SSA's COLA adjustments will be posted here prior to the beginning of each calendar year: <https://www.ssa.gov/cola/>.

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.

Homes for Good does not request to waive any of the safe harbors related to this waiver and will operate within the following safe harbors:

Reexaminations must occur at least every three years.

The agency must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more.

Agency must implement an impact analysis.

Agency must include a hardship policy.

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 only to a subset or subsets of assisted households

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

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

Elderly and/or Disabled Families with fixed income sources

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

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 - have yet to implement

Does this MTW activity require a hardship policy?

Yes

This document is attached.

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

Yes

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

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

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

No

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

No hardship were requested in the most recent fiscal year.

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

Yes

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

3.b. - Alternative Reexamination Schedule for Households (HCV)

What is the recertification schedule?

Once every three 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.

Homes for Good interim policies are as follows:

- Homes for Good will allow households to request an interim if the household's income decreases.
- Homes for Good will not require a household to report increases in income or changes.
- Homes for Good will apply the most recent payment standard during the interim, reducing the likelihood that a rent increase negatively impacts the rent burden of the household.

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 will implement a triennial recertification policy for elderly and disabled 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 plans to implement this policy in the Housing Choice Voucher program first, then implement in the Public Housing program the following year.

In lieu of an annual certification, elderly and disabled households will receive an automatic adjustment to their income by the Cost-of-Living-Adjustment (COLA) factor used by the Social Security Administration (SSA). SSA's COLA adjustments will be posted here prior to the beginning of each calendar year: <https://www.ssa.gov/cola/>.

Waiving these provisions will allow Homes for Good to implement a triennial recertification policy for elderly and disabled 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 plans to implement this policy in the Housing Choice Voucher program first, then implement in the Public Housing program the following year.

In lieu of an annual certification, elderly and disabled households will receive an automatic adjustment to their income by the Cost-of-Living-Adjustment (COLA) factor used by the Social Security Administration (SSA). SSA's COLA adjustments will be posted here prior to the beginning of each calendar year: <https://www.ssa.gov/cola/>.

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.

Homes for Good does not request to waive any of the safe harbors related to this waiver and will operate within the following safe harbors:

Reexaminations must occur at least every three years.

The agency must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more.

Agency must implement an impact analysis.

Agency must include a hardship policy.

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 only to a subset or subsets of assisted households

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Elderly families; Disabled families (to the extent those families are not exempt via a reasonable accommodation); Other – another specifically defined target population or populations.

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

Elderly and/or disabled families on fixed income

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.

Applies to any tenant based or project based household that is a family of elderly and/or disabled status with fixed income.

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.

Implementation will become effective with the 10.01.24 Annual reviews

Does this MTW activity require a hardship policy?

Yes

This document is attached.

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

Yes

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

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

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

No

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

No hardship were requested in the most recent fiscal year.

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

Yes

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

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

What is the recertification schedule?

Once every three 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.

Homes for Good interim policies are as follows:

- Homes for Good will allow households to request an interim if the household's income decreases.
- Homes for Good will not require a household to report increases in income or changes.
- Homes for Good will apply the most recent payment standard during the interim, reducing the likelihood that a rent increase negatively impacts the rent burden of the household.

5.a. - Pre-Qualifying Unit Inspections (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.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.

HFG does not request waiving any of the safe harbors for this activity, which are listed below:
The pre-inspection must have been conducted within 90 days of the participant occupying the unit.
The participant must be able to request an interim inspection.

HQS inspection standards must not be altered as found at 24 C.F.R. 982.401.

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.

We received three requests for pre-qualifying unit inspections, and complete the three requests. We intend to do more outreach of this activity in the future.

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

No

How long is the pre-inspection valid for?

The pre-inspection is valid for 90 days.

5.c. - 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 will 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. We conduct monitoring inspections to verify that the units comply with the required HQS and/or NSPIRE standards. These inspections are carried out by PHA staff who were not involved in the initial inspection. This practice ensures a high level of quality control by providing an independent review of the units.

Homes for Good does not request to waive any of the safe harbors related to this waiver and will operate within the following safe harbors:

The agency shall establish and make available a quality assurance method to ensure an objective analysis.

The participant must be able to request an interim inspection.

HQS inspection standards must not be altered as found at 24 C.F.R. 982.401.

At the Department's request, the agency must obtain the services of a third-party entity to determine if PHA-owned units pass HQS.

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?

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.

For the time period of 10/01/23 - 07/16/24 our PHA was able to complete 86 inspections using PHA staff. This saved the PHA \$15,470.00

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

No

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

Following will explain the quality assurance method

In conducting quality control, PHA supervisory staff will use a random selection process to determine which units will be inspected for compliance with HQS and/or NSPIRE standards, as applicable.

The review of these randomly selected units will be performed by PHA staff who were not involved in the initial inspection, ensuring a high level of quality assurance through independent evaluation.

Additionally, upon request from HUD, PHA will provide further oversight by engaging a third-party inspector who is not a PHA staff member.

No 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 Educator 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.

All inspections have been moved to a tri cycle. During the time frame of 10/01/23 - 07/16/24 the PHA did not receive any requests for a special inspection related to the move to a tri cycle.

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

No

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 implements a waiver allowing 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.

Homes for Good will operate within the following safe harbors:

A subsidy layering review must be conducted.

The agency must complete site selection requirements.

HQS inspections must be performed by an independent entity according to 24 C.F.R. 983.59(b) or 24 C.F.R. 983.103(f) unless MTW 5.c is implemented.

The agency is subject to Notice PIH 2013-27 where applicable, or successor.

Property must be owned by a single-asset entity of the agency, see Notice PIH 2017-21.

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.

PHA has not utilized waiver as of the date of this submission.

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

No

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 Homes for Good will 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. Homes for Good 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. Homes for Good intends to offer portability to PSH PBV via a local preference based on scoring under Homes for Good'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 Homes for Good's waitlists are offered a tenant-based voucher first.

Homes for Good previously received approval to waive the following Safe Harbor: Portability under this activity must not be restricted for more than 24 months.

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.

This waiver has only recently been put into practice, and in turn no data has accumulated thus far.

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

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

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.

i. Portability under this activity must not be restricted for more than 24 months.

Homes for Good not request to waive any other safe harbors related to this waiver and will operate within the following safe harbors:

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.

ii. Participants must still retain the ability to request a tenant-based voucher for reasonable accommodation according to existing rules.

D.	Safe Harbor Waivers.
D.1	<p>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</p> <p>Yes, the Safe Harbor Waiver request(s) for 2b, 9h is(are) attached.</p>

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</p> <p>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p>No</p>

E.2	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>Does the MTW agency have any approved Agency-Specific Waivers? No</p>
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F.	Public Housing Operating Subsidy Grant Reporting.
F.1	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2022	\$2,106,617	\$2,106,617	\$0	2030-09-30
2023	\$1,710,993	\$1,515,064	\$195,929	2031-09-30
2024	\$2,630,963	\$1,704,169	\$926,794	2032-09-30

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

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

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

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

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

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

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

H.	Public Comment
	Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.
	Please see attached for an additional public hearing held for Agency-Specific Waiver(s) and/or Safe Harbor Waiver(s)

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 ~~01/10/2024~~, hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

Homes for Good

OR 006

MTW PHA NAME

MTW PHA NUMBER/HA CODE

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

Michelle Thurston

Homes for Good Board Chairperson

NAME OF AUTHORIZED OFFICIAL

TITLE



Michelle Thurston (Jun 26, 2024 15:34 PDT)

06/26/2024

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.*

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

We had no attendees at the public hearing. In turn, there are no sign in sheets to submit.

Homes for Good PHA Annual & 5-Year Plans

Notice of 45-Day Comment Period and Public Hearing

Homes for Good Housing Agency is updating its PHA Annual & 5-Year Plans. These plans guide the planning and implementation of federal programs under the jurisdiction of the Department of Housing and Urban Development for the period beginning October 1, 2024. The federal programs related to housing and other needs for low-income persons covered by the Agency Plans include, but are not limited to, Capital Fund, Section 8 and Public Housing Admission policies, Self Sufficiency, and Resident participation.

The public examination and comment period begins April 29, 2024 and ends June 14, 2024. There will be a public hearing on June 13, 2024 at 1:30 p.m. at the Homes for Good Service Center first floor at 100 West 13th Avenue Eugene, OR 97401 and via Microsoft Teams.

Topic: Homes for Good PHA Annual & 5-Year Plan Public Hearing

Time: June 13, 2024 at 01:30 PM Pacific Time (US and Canada)

Online:

<https://www.microsoft.com/en-us/microsoft-teams/join-a-meeting>

Meeting ID: 242 641 447 277

Passcode: Dx6cZu

Dial-in by phone:

[+1 689-206-0388,,880802540#](tel:+16892060388880802540) United States, Orlando

Phone conference ID: 880 802 540#

Comments may be presented in person during this meeting, or in writing as noted below. The draft plans and all supporting documents may be viewed at Homes for Good Service Center 100 West 13th Ave Eugene, OR 97401 and on our website at homesforgood.org

If you have any questions regarding the plans or would like to submit any written comments, please contact Amy Smith, Compliance & Data Analyst; at 100 West 13th Ave Eugene, OR 97401, asmith@homesforgood.org or 541-682-2537. To request a reasonable accommodation for this meeting, please call 541-682-2537 at least 24 hours prior to the meeting time.

The Agency is an equal opportunity employer and complies with State and Federal laws and regulations relating to the 1973 Rehabilitation Act, Section 504, and the 1990 Americans with Disabilities Act (ADA) and the 2009 ADA Amendments Act (ADAAA). Homes for Good does not discriminate on the basis of disability status in the admission or access to its federally assisted programs or activities.

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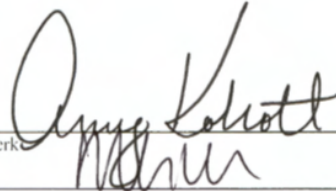
Homes For Good
Homes For Good
100 W 13Th AVE
Eugene OR 97401-3433

STATE OF WISCONSIN, COUNTY OF BROWN

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04/29/2024, 05/06/2024, 05/13/2024, 05/20/2024, 05/28/2024,
06/03/2024, 06/10/2024

Sworn to and subscribed before on 06/10/2024



Legal Clerk

Notary, State of WI, County of Brown

8.25.26

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OR - 3

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MARIAH VERHAGEN
Notary Public
State of Wisconsin

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

We had no attendees at the public hearing. In turn, there are no sign in sheets to submit.

Homes for Good MTW Supplement to the Annual Plan

Notice of 45-Day Comment Period and Public Hearing

Homes for Good Housing Agency is updating its Moving to Work (MTW) Supplement to the Public Housing Authority (PHA) Annual Plan (the "Supplement") for submission to HUD. The MTW program gives Homes for Good specific funding and programmatic flexibilities. The Supplement describes the ways in which Homes for Good plans to use its MTW flexibilities in the Fiscal Year starting October 1, 2024. Homes for Good also prepared a "reader-friendly" narrative that describes the waivers included in its plan. This narrative can be found on the MTW page on the Homes for Good website.

A separate public hearing is required for the Supplement because it includes a request to waive one or more of HUD's safe harbor waivers and an agency-specific waiver. The public examination and comment period of the Supplement begins April 29, 2024 and ends June 14, 2024. There will be a public hearing on June 13, 2024 at 2:00 p.m. at the Homes for Good Service Center first floor at 100 West 13th Avenue Eugene, OR 97401 and via Microsoft Teams.

Topic: Homes for Good MTW Supplement to the Annual Plan

Public Hearing Time: June 13, 2024 at 02:00 PM Pacific Time
(US and Canada)

Online:

[https://www.microsoft.com/en-us/microsoft-teams/join-](https://www.microsoft.com/en-us/microsoft-teams/join-a-meeting)

[a-meeting](https://www.microsoft.com/en-us/microsoft-teams/join-a-meeting) Meeting ID: 264 634 643 847

Passcode: PQG48u

Dial-in by phone:

+1 689-206-0388,,528957651# United States, Orlando

Phone conference ID: 528 957 651#

Comments may be presented in person during this meeting, or in writing as noted below.

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discriminate on the basis of disability status in the admission or access to its federally assisted programs or activities.

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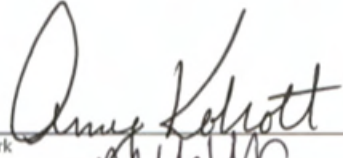
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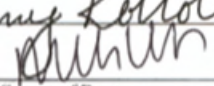
STATE OF WISCONSIN, COUNTY OF BROWN

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04/29/2024, 05/06/2024, 05/13/2024, 05/20/2024, 05/28/2024,
06/03/2024, 06/10/2024

Sworn to and subscribed before on 06/10/2024

Legal Clerk 

Notary, State of WI, County of Brown

8.25.26

My commission expires

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Homes for Good Moving to Work (MTW) Supplement to the Annual Plan Notice of 45-Day Comment Period and Public Hearing
Homes for Good Housing Agency is updating its Moving to Work (MTW) Supplement to the Public Housing Authority (PHA) Annual Plan (the "Supplement") for submission to HUD. The MTW program gives Homes for Good specific funding and programmatic flexibilities. The Supplement describes the ways in which Homes for Good plans to use its MTW flexibilities in the Fiscal Year starting October 1, 2024. Homes for Good also prepared a "reader-friendly" narrative that describes the waivers included in its plan. This narrative can be found on the MTW page on the Homes for Good website.

A separate public hearing is required for the Supplement because it includes a request to waive one or more of HUD's safe harbor waivers and an agency-specific waiver. The public examination and comment period of the Supplement begins April 29, 2024 and ends June 14, 2024. There will be a public hearing on June 13, 2024 at 2:00 p.m. at the Homes for Good Service Center first floor of 100 West 13th Avenue Eugene, OR 97401 and via Microsoft Teams.
Topic: Homes for Good MTW Supplement to the Annual Plan Public Hearing
Time: June 13, 2024 at 02:00 PM Pacific Time (US and Canada)

Online:
<https://www.microsoft.com/en-us/microsoft-teams/join-a-meeting>
Meeting ID: 264 634 643 847
Passcode: PQG4lu
Dial-in by phone:
+1 689-206-0388, 528957651# United States, Orlando
Phone conference ID: 528 957 651#

Comments may be presented in person during this meeting, or in writing as noted below. The draft MTW Supplement and all supporting documents may be viewed at Homes for Good Service Center 100 West 13th Ave Eugene, OR 97401 and on our website at homesforgood.org

If you have any questions regarding the plans or would like to submit any written comments, please contact Amy Smith, Compliance & Data Analyst; at 100 West 13th Ave Eugene, OR 97401, asmith@homesforgood.org or 541-682-2537. To request a reasonable accommodation for this meeting, please call 541-682-2537 at least 24 hours prior to the meeting time. The Agency is an equal opportunity employer and complies with State and Federal laws and regulations relating to the 1973 Rehabilitation Act, Section 504, and the 1990 Americans with Disabilities Act (ADA) and the 2009 ADA Amendments Act (ADAAA). Homes for Good does not discriminate on the basis of disability status in the admission or access to its federally assisted programs or activities.

HOMES FOR GOOD
Received - Eugene - Mail

JUN 17 2024

MARIAH VERHAGEN
Notary Public
State of Wisconsin

MTW Agency Name: Housing Authority & Community Services of Lane County (aka Homes for Good)

Waiver Submission Date: 07/16/2024

Waiver Type: Safe Harbor Waiver

Waiver Title: Self-Certification of Exception Payment Standards – Reasonable Accommodation

Waiver Description: This activity will waive provisions of 24 CFR 982.503 (c)(1) [formerly 24 CFR 982.503(b)(1) sections (v-vi)] and PIH Notice 2018-18 and successor notices to allow Homes for Good (HFG) to utilize an reasonable accommodation (RA) exception payment standards (EPS) without consideration for the 120% Fair Market Rent (FMR) limitation and without prior HUD approval, while ensuring that any approved rent meets the rent reasonableness standard (up to 150%).

HFG intends to utilize reasonable accommodation EPS to assist families with disabled individuals in finding affordable units that include the features needed to address their disabilities.

HFG will continue to apply the rent reasonableness standard when reviewing and approving any RA EPS.

It is not projected to create any hardship for HCV applicants or participants. Participants may request an informal review/hearing when and if their request for RA EPS is denied. HFG will follow its applicable policies on reviews and hearings.

Citations/Regulations/Statutes to be Waived: The regulation (24 CFR 982.503 (c)(1)) is already waived by the MTW Operations Notice. This request seeks to waive safe harbor 2.b.i.

MTW Operations Notice Safe Harbor(s) to be Waived: MTW Activity 2.b.i Payment Standard must be between 80% and 120% of the FMR

Background/Local Need:

The current process to approve an Exception Payment Standard (EPS) through the field office is time consuming and burdensome for the family, the housing agency, and HUD, and many times while approval was pending, the unit becomes unavailable. 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.

This activity supports the MTW objective of improving housing choice for eligible low-income families by providing greater opportunity for disabled households to find accessible units during their voucher term. The activity also supports the MTW objective of increasing cost effectiveness by decreasing the administrative burden for HFG when having to request approval from HUD for EPS outside of the 120% limitation:

- Staff time savings – general turnaround time of 7 days to receive response from HUD
- Reduction in amount of time it takes to process an EPS – the 7 days of wait time will be eliminated once the PHA can review EPS
- Increase in HAP expenditures – 7X the avg PUC of \$644 (TYT data) = \$4,508 X 12 = \$54,096
- Number of RTA's that fall through -July 22 thru March 23 – 7 RTAs fell thru due to LL not willing to wait

The application of this policy will not cause any hardship to HCV families.

Waiver/Activity Precedent (if any): Housing Authority & Community Services of Lane County (aka Homes for Good) is seeking approval of the same safe harbor waiver as the Housing Authority of the County of Salt Lake's SHW titled MTW Reasonable Accommodation Exception Payment Standard and approved on August 4, 2023.

Homes for Good Hardship Policy

April 22, 2024

Purpose

As a Moving to Work (MTW) housing authority, Homes for Good has the ability to waive certain HUD policies that may result in unintended negative impacts on specific households. When such policies are implemented, MTW agencies must have a hardship policy in place that allows impacted households to request relief.

MTW agencies may choose to have separate hardship policies for each MTW waiver or a single hardship policy that covers all waivers. Homes for Good chose to implement a single hardship policy for all applicable waivers. However, the agency may choose to implement additional hardship policies in the future if additional waivers are implemented that do not align with this policy.

Households Eligible for Hardship Exemption

A family qualifies for a hardship exemption when their total family share exceeds 50% of the gross income used to determine a household's rent subsidy. Total family share is defined as the family's portion of rent plus the family's utility allowance. Exceptions to this policy include the following circumstances:

- When the family's share exceeds 50% of gross income due to the family's choice to rent a unit with more bedrooms than the household's voucher size; or
- When the household has not been negatively impacted by any MTW waivers.

Submission of a Hardship Exemption

Hardship requests must be received by the 15th of each month to be eligible for a revised rent effective on the first of the next month. Hardship exemption requests and adjustments will not be retro-active.

A Hardship Request will be considered "received" when all of the following applicable documents have been submitted:

- Completed Hardship Request Form, available on Homes for Good's website;

- For households who have recently lost earned income- proof of application for unemployment;
- For households with minor children- proof of application for TANF and/or child support;
- Proof of application / participation in one of Homes for Good’s self-sufficiency programs; and/or
- Proof of application for low-income energy assistance through Homes for Good or an external community partner.

Process for Agency Review and Determination

When a family requests a hardship exemption from an MTW waiver, Homes for Good will take the following actions:

- Determine whether a hardship exists prior to the first of the following month, taking into account the aforementioned 15th of the month deadline:
 - If the request does not meet the hardship standards, there will not be any adjustments to the family’s portion of rent by Homes for Good.
 - If the request does meet the hardship standards, the agency will adjust the total family share of rent plus utilities allowances the family is responsible for by the first of the following month as follows: set the total family share to the greater of \$0 or 40% of the family’s adjusted gross income.

Family Notification

Homes for Good will take the following actions in order to promote this policy among its applicants and program participants:

- Include a copy of the hardship policy in the publicly-viewable version of its MTW Supplement to the PHA Plan, the agency’s Administrative and Occupancy Plan (ACOP), and the agency’s Administrative Plan;
- Notify applicants of this hardship policy at intake;
- Review this hardship policy with families at recertification; and
- Consider if a family qualifies for a hardship exemption when assistance is to be terminated due to an MTW activity.

Grievance Procedure

If Homes for Good denies a hardship request, the family may file a grievance according to the agency's Grievance Policy found in both Homes for Good's ACOP and Administrative Plan.

Exception Payment Standard Activity Impact Analysis

August 26, 2024

MTW Operations Notice 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 finances	Increase in HAP expenditures of \$54,096. This was calculated by multiplying the average per monthly unit cost of \$644 (from HUD's Two-Year Tool (TYT) data) by the number of RTA's that fell through over a twelve-month period (7 RTA's). This resulted in an annualized expense of \$54,096.
2	Impact on affordability of housing costs for affected families	Exception Payment Standards make housing more affordable for households needing units with accessibility features, which often rent at levels exceeding the payment standard. This waiver will reduce the cost to these households, making their housing costs more affordable and accessible.
3	Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)	This activity will reduce the time it takes households needing units with accessibility features that are over the payment standard to find a suitable unit. Homes for Good estimates that this change will reduce the time by seven (7) days for these households, which is the average time it takes HUD to review and approve exception payment standards.
4	Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)	Homes for Good does not anticipate any impact to the agency's termination rate due to this waiver as it does not directly relate to the termination of assistance.
5	Impact on the agency's current occupancy level in public housing	Since this activity is for Housing Choice Voucher only, it will not impact Public Housing occupancy. Also, since the number of households impacted by this activity is very low

#	Question	Answer	
	and utilization rate in the HCV program	compared to the number of households served by the agency's voucher program, Homes for Good anticipates that the approvals of payment standards will have minimal impact on its utilization. Homes for Good anticipates that the PUC rates will increase, but this adjustment will affect only an average of seven families. Consequently, the financial impact of this change is minimal.	
6	Impact on meeting the MTW statutory goals of cost effectiveness, self sufficiency, and/or housing choice	Cost effectiveness	This waiver will streamline the process of approving higher payment standards for households requiring accessibility features.
Self-sufficiency		As this activity is designed to help disabled families find a suitable unit quicker, Homes for Good does not anticipate an impact on self-sufficiency.	
Housing choice		This waiver will increase housing choice for households receiving reasonable accommodations for accessibility features.	
7	Impact on the agency's ability to meet the MTW statutory requirements	1. Ensure that 75% of newly assisted households have very low incomes	No anticipated impact. This activity is related to disabled households with reasonable accommodations who otherwise meet program eligibility requirements.
2. Establish a reasonable rent policy that encourages employment and self-sufficiency		No anticipated impact. This activity is designed to help disabled households and therefore Homes for Good does not expect an impact on employment or self-sufficiency.	
3. Continue to assist substantially the same number of households		No anticipated impact. Due to the small number of impacted households, Homes for Good does not anticipate any impact on its ability to serve the same number of households.	
4. Continue to assist a comparable mix of households by family size		No anticipated impact. This waiver is not related to family size.	
5. Meet Housing Quality Standards requirements		No anticipated impact. The units approved for Exception Payment Standards will be required to meet the same HQS	

#	Question	Answer
		(or INSPIRE) requirements as other units entering the program.
8	Impact on the rate of hardship requests and the number granted and denied as a result of this activity	Homes for Good does not expect this waiver to have an impact on the number of hardship requests granted or denied since it does not anticipate that any hardship requests will result from this activity.
9	Impact on protected classes and any associated disparate impact	Homes for Good's use of this waiver is intended to help disabled households with a reasonable accommodation who need specific accessibility features. Therefore, Homes for Good expects that this activity will have a positive impact on the disabled households it serves.

Reexamination Activity Impact Analysis

April 22, 2024

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Description of the Waiver

Homes for Good proposes to implement a triennial reexamination schedule for all elderly and disabled households within the Housing Choice Voucher (HCV) program who are on fixed incomes. Under this waiver, impacted households 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.

4. Eligible households will receive an automatic adjustment to their income by the Cost-of-Living-Adjustment (COLA) factor used by the Social Security Administration (SSA). SSA's COLA adjustments will be posted here prior to the beginning of each calendar year: <https://www.ssa.gov/cola/>.

Definitions Used in the Analysis

- **Work able:** household does not receive an elderly/disabled allowance.
- **Fixed Income:** indicates that a household does not have any earned income.
- **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

Homes for Good 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
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 (fixed income)	Review of last 3 years of 50058 data

Data Point	Data Analysis Method
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

These metrics were assigned to members of the Homes for Good 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 that the policy changes will 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.

Update for the FY2025 MTW Supplement

Homes for Good first asked for approval of this activity in its FY2024 MTW Supplement to the PHA Plan but did not implement it due to a major software implementation at the agency. As initially proposed, the activity would have applied to all HCV households and the impact analysis showed a significant financial impact to the agency.

Homes for Good used the time over the last year assess options that would be more cost neutral while still resulting in significant administrative savings. The result was to narrow the scope of the activity so that it only applied to elderly and disabled households on fixed incomes, which still represents 68% of Homes for Good’s population.

Results

Data Points 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
Annual staff time in hours to process recertifications (no interims) – includes hours 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

Financial Impact to the Agency

Based on its analysis, Homes for Good determined this policy change will have a negative impact to the agency’s HAP expenses, increasing annual HAP expenditures by \$144,867 per year (see row “t” in the chart below). This is measured by looking at the increases in income that have been processed over the last three years and the associated increase in rent and decrease in HAP, taking into account 2023’s annual COLA adjustment of 3.2%. By changing the review cycle to every three (3) years, the incremental decreases in HAP expense will not be fully realized. The chart below shows a summary of this analysis for the different groups that were considered. The fixed income column is highlighted since Homes for Good ultimately chose to apply this policy to fixed income households only.

Metric	Fixed Inc Only	Formula
- Control: Number of Annuals Last 3 Years	7,149	
a. Avg Increase in Income Last 3 Years	\$1,861	
b. Number of Households with Increase in Income Last 3 Years	4,161	
c. Avg Decrease in Income Last 3 Years	\$2,559	
d. Number of Households with Decrease in Income Last 3 Years	453	
e. Total Annual HAP Based on Last Annual	15,114,636	
f. HAP Reductions due to COLA Year 1	\$241,524	
g. HAP Increases due to Income Decreases Year 1	\$386,392	c x d
h. Projected HAP Year 1	\$15,259,504	e - f + g
i. Number of Interim Ups Last 3 Years	131	
j. Avg Cost to Process Interim	\$27	
k. Avg Cost to Process Annual	\$135	
l. Total Annual Cost to Process Interim Ups	\$1,179	(i x j) / 3
m. Number of Interim Downs Last 3 Years	497	
n. Average Number of Interims Last 3 Years	1,249	
o. Estimated Number of Interims Under New Policy	166	m / 3
p. Average Number of Annuals Last 3 Years	2,083	
q. Estimated Number of Annuals Under New Policy	694	p / 3
r. Total Annual Reduction in Number of Reviews Under New Policy	2,472	(p - q) + (n - o)
s. Cost Savings Due to Reduction in Reviews	\$234,488	(k x (p - q)) + (j x (n - o)) + Postage
t. Impact on HAP expenditures	\$144,868	h - e
u. Total Annual Cost Savings (Loss)	\$89,621	e - h + s

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 elderly and disabled HCV households on fixed incomes. The results shown in the chart below confirm the following:

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;
4. There was not a significant difference in the impact on households based on race or ethnicity.

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 Fixed Income Population (# annuals/move-ins last 3 years)	107	316	51	439	6,668	417	6,733	333	6,445	3,069	6,245	793	101	
b. Households with Increase in Income Last 3 Years	59	183	27	253	3,883	233	3,928	179	3,764	1,961	3,544	529	79	
c. Percent of Population with Increase	55%	58%	53%	58%	58%	56%	58%	54%	58%	64%	57%	67%	78%	b / a
d. Average Income Increase	\$2,426	\$2,307	\$8,945	\$2,255	\$1,839	\$3,435	\$1,768	\$6,118	\$1,794	\$1,359	\$1,158.25	\$3,604.92	\$15,632.24	

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 (\$15,632 vs. \$3,544 for ELI families). These households only represent only 1.5% of the fixed income 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 an increase in HAP, Homes for Good may see a slight reduction in utilization due to this policy change. However, the agency anticipates that the administrative savings from the activity will offset the increase in HAP.	
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 \$244,488 per year in administrative expenses
		Self-sufficiency	Since this policy only applies to elderly and disabled households on fixed incomes, this metric does not apply.
		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	Since this policy only applies to elderly and disabled households on fixed incomes, this metric does not apply.
		3. Continue to assist substantially the same number of households	The agency expects that this policy will not impact its ability to meet the STS requirement.
		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	Since this policy change deals with the frequency of reexaminations, it will not have any impact on meeting HQS requirements.
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. However, the standard Homes for Good Hardship Policy will apply in the event this policy results in a hardship.	

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 anticipates that this policy will have a positive impact on households and that the increase in HAP expenditures will be offset by reduced administrative costs.