

PHA Name : New Hampshire Housing Finance Agency

PHA Code : NH901

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

PHA Program Type: Housing Choice Voucher (HCV) only

MTW Cohort Number: Asset Building

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

Utilizing MTW flexibility, NHHFA intends to:

1. Deliver housing programs and services in a more efficient, streamlined manner that is accessible and transparent to clients, and that reduces unnecessary administrative burdens on clients and staff.
2. Expand housing options and choices to serve the unique, diverse needs of New Hampshire's low-income residents, promoting mobility to high opportunity areas and strengthening partnerships to serve individuals and families in need of supportive services; and
3. Support residents in achieving economic self-sufficiency through a new MTW Opt-Out Savings Account Option, enhanced FSS program incentives and other partnership initiatives utilizing housing as a platform to stabilize and strengthen families.

NHHFA is committed to meaningful community engagement in the planning and implementation of asset building and other MTW initiatives. NHHFA has an existing Resident Advisory Board (RAB) whose membership includes HCV participants who currently provide input and recommendations regarding the PHA Plan. NHHFA consulted with the RAB to develop this MTW plan and application and will continue to consult with the group on an ongoing basis to develop future MTW strategies including those proposed in each annual MTW Supplement.

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	
b. Tiered Rent (HCV)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
f. Minimum Rent (HCV)	Plan to Implement in the Submission Year
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Plan to Implement in the Submission Year
q. Imputed Income (HCV)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
u. Standard Deductions (HCV)	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)	Not Currently Implemented
3. Reexaminations	
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
d. Self-Certification of Assets (HCV)	Plan to Implement in the Submission Year
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)	Plan to Implement in the Submission Year
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Plan to Implement in the Submission Year
6. Short-Term Assistance	
b. Short-Term Assistance (HCV)	Plan to Implement in the Submission Year
7. Term-Limited Assistance	
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)	Plan to Implement in the Submission Year
b. Increase PBV Project Cap (HCV)	Plan to Implement in the Submission Year
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Plan to Implement in the Submission Year
10. Family Self-Sufficiency Program with MTW Flexibility	
a. HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program	

Coordinating Committee (HCV)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
11. MTW Self-Sufficiency Program	
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Plan to Implement in the Submission Year
12. Work Requirement	
b. Work Requirement (HCV)	Not Currently Implemented
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
14. Moving on Policy	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	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)	
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented
c. Housing Development Programs	Not Currently Implemented

C. MTW Activities Plan that New Hampshire Housing Finance Agency Plans to Implement in the Submission Year or Is Currently Implementing

1.f. - Minimum Rent (HCV)
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>NHHFA plans to implement a minimum tenant rent (total tenant payment) of \$50.00. Elderly and disabled households are exempt from this activity. For existing households who have a TTP below \$50, the new minimum rent will be implemented within 90 days of the effective date of this MTW activity. New Admission families are notified of the minimum rent and hardship policy at intake and at each regular reexamination.</p> <p>The VASH special purpose vouchers are exempt from this policy. Minimum rent will be extended to the following the special programs FUP, EHV, FYI in accordance with the MTW Operations Notice. Each family impacted by the minimum rent will receive information on the Family Self-Sufficiency (FSS) program and has access to financial budgeting and employment coaching.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness; Self-sufficiency</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Decreased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new</p>

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.

Non-elderly, non-disabled families

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.

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.)

1.f. - Minimum Rent (HCV); 2.b. - Payment Standards- Fair Market Rents (HCV); 3.b. - Alternative Reexamination

Schedule for Households (HCV)

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

No

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

No hardship were requested in the most recent fiscal year.

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

No

How much is the minimum rent or minimum Total Tenant Payment (TTP)?

\$50.00

1.o. - Initial Rent Burden (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**

NHHFA is requesting to waive certain provisions of section 8(o)(3) of the 1937 Housing Act and 24 CFR 982.508. We request to raise the maximum family share at initial occupancy not to exceed 45%. The goal is to keep most families at 40% but would use the exception for families who want to pay a higher amount to receive more housing opportunities. We will not allow the family share at initial occupancy to exceed 60% of the family's monthly income.

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.

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

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

No

If the MTW agency plans to implement a new maximum income-based rent percentage (higher than 40% of adjusted monthly income), what is that maximum?

45.00%

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**

Waiver of provisions of 24 CFR § 982.503: NHHFA is requesting to set payment standard amounts between 80% and 120% of the Fair Market Rent (FMR).

• Waiver of provisions of 24 CFR § 982.505:

o If the payment standard amount is increased during the term of the HAP contract, the increased payment standard amount shall be used to calculate the monthly housing assistance payment for the household at any time after the effective date of the increase, rather than waiting for the next regular reexamination.

o If the household voucher size increases or decreases during the HAP contract term, the new household unit voucher size will be used to determine the payment standard amount for the family at any time after the effective date of the change in family size, rather than waiting for the next regular reexamination.

• If the payment standard amount has decreased, during the term of a HAP contract, NHHFA will not reduce the payment standard as long as the HAP contract remains in effect. If the household moves to a new unit, NHHFA will apply the payment standard in effect at the time of the move.

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

Housing choice
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Increased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies to all assisted households
Does this MTW activity require a hardship policy? Provided Already
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
Does the MTW activity require an impact analysis? Yes This document is attached.
Does the impact analysis apply to more than this MTW activity? No
Please explain the payment standards by FMR: Waiver of provisions of 24 CFR § 982.503: NHHFA's payment standard amounts will be set between 80% and 120% of the Fair Market Rent (FMR).

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 NHHFA is requesting to waive to 24 CFR 982.516 (a)(1). Our proposed policy is the PHA will conduct a reexamination of family income and composition at least triennially. NHHFA will allow at least one interim adjustment per year at the request of the household if the household gross income decreases by 10% or more. Exceptions to this policy will include: • Zero income households will be recertified every year.
Which of the MTW statutory objectives does this MTW activity serve? Cost effectiveness; Self-sufficiency
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Decreased revenue
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies to all assisted households

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

No

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.

NHHFA is requesting to conduct reexaminations triennially. Zero income households will be completed annually. The agency will allow at least one interim adjustment per year at the request of the household, if the gross income has decreased by 10% or more.

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

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

NHHFA is requesting to allow self-certification of assets at reexamination up to \$50,000.

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

Cost effectiveness

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

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

No

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

\$50,000.

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

NHHFA is requesting to conduct pre inspections on project-based voucher units on an as needed basis. The pre inspection will be completed within 90 days of the participant occupying the unit. The participant will be able to request an interim inspection. HQS inspection standards at 24 CFR 982.401 will not be altered.

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

Cost effectiveness; Housing choice

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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.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**

NHHFA is requesting to conduct inspections every three years for properties financed with Low Income Housing Tax Credits. Other units will be added to triennial inspections based on the quality of the unit and previous inspection results. All other unit inspections will be conducted biennially. All units will be inspected at least once every three years, The participant may request an interim inspection. HQS standards as found at 24 CFR 982.401 will not be altered. HUD can conduct or request the agency to perform an inspection at any time for health and safety, as well as accessibility purposes.

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

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

No

6.b. - Short-Term Assistance (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

NHHFA may create a short-term housing assistance program with supportive services in its HCV program.

- The term of assistance will not be shorter than 3 months.
- The term of assistance will not be longer than 36 months.
- The short-term housing assistance program will include supportive services in one or more buildings (which may be in collaboration with local community-based organization and government agencies).
- Subject to availability, successful participants of the short-term housing assistance program will be given the option of transferring into the Housing Choice Voucher program.
- Under no circumstances will participants be required to participate in supportive services that are targeted to persons with disabilities in general, or persons with any specific disability.
- NHHFA will not require participation in supportive services as a condition for housing subsidy for elderly and disabled families.
- If NHHFA requires participation in supportive services as a condition for housing subsidy, an impact analysis will be developed and adopted in accordance with MTW guidance prior to the implementation of the activity.
- If NHHFA requires participation in supportive services as a condition for housing subsidy, a hardship policy will be developed and adopted in accordance with MTW guidance prior to the implementation of the activity.
- The activity will not be extended to the entire HCV program and will only serve specific populations.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

Does this MTW activity require a hardship policy?

No

No document is attached.

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

No

Does the MTW activity require an impact analysis?

No

No document is attached.

What is the term of assistance?

36 months

How is the tenant contribution established for this program?

Flat rent or percentage of household income.

How many households do you expect to serve in this program in the Fiscal Year?

How do you fulfill the obligation to offer participants in this program the opportunity to transition to the HCV or public housing (as applicable) program subject to availability?

Establish a preference upon completion of the services or transition to permanent housing.

Please list any partner organizations and briefly note the services that each provides.

none at this time

9.a. - Increase PBV Program Cap (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

New Hampshire Housing Finance Authority (NHHFA) will increase the number of authorized units that it project-bases to not more than 50% of the lower of either the total authorized units or annual budget authority.

The intent of increasing the PBV Program Cap is to increase safe, affordable housing options to communities across the state. Increasing the number of PBV's demonstrates NHHFA's dedication to providing safe affordable housing to their communities.

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

Cost effectiveness; Housing choice

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

No

What percentage of total authorized HCV units will be authorized for project-basing?

50.00%

9.b. - Increase PBV Project Cap (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

NHHFA may increase the Project Based Voucher Cap up to 100%, allowing projects to be full PBV. The intent of increasing the PBV Program Cap is to increase safe, affordable housing options to communities across the state. Increasing the number of PBV's demonstrates NHHFA's dedication to providing safe affordable housing to their communities. NHHFA will use PIH notice 2013-27 where applicable or its successor.

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

Cost effectiveness; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on

what you know today.

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

NHHFA will waive the requirement to provide a tenant-based voucher at 12-months and increase the requirement to not more than 24-months. Participants may request an exception to the rule if the current location of housing prevents gainful employment, financial hardship, or limits medical care. VAWA and reasonable accommodations are also exceptions to this waiver.

Participants who are currently housed in a PBV unit have secured safe and affordable housing. Extending the program requirement to 24-months may allow NHHFA to pull applicants on the wait list who are currently facing homelessness and having been waiting extended periods of time for assistance.

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

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

No

11.b.HCV - Policies for Addressing Increases in Family Income (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

NHHFA will implement an MTW self-sufficiency program with the goal of creating opportunities to increase self-sufficiency for working families by incentivizing families who obtain new employment and remain continually employed.

- Incentivize families when they work for six consecutive months with a \$50 gift card
- Incentivize families with zero income or those who are not enrolled in the asset building cohort who subsequently

become employed and work for six consecutive months with a \$50 gift card.

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

Self-sufficiency

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

Increased expenditures

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

The MTW activity applies 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.

Non-elderly, non-disabled families

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

Does this MTW activity require a hardship policy?

No

No document is attached.

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

No

Does the MTW activity require an impact analysis?

No

No document is attached.

What is the policy for the increased earnings for families participating in the MTW Self-Sufficiency program?

- Incentivize families when they work for six consecutive months with a \$50 gift card
- Incentivize families with zero income or those who are not enrolled in the asset building cohort who subsequently become employed and work for six consecutive months with a \$50 gift card

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

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</p> <p>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p>Yes, the Agency-Specific Waiver request is attached.</p>
E.2	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>Does the MTW agency have any approved Agency-Specific Waivers?</p> <p>MTW Agency does not have approved Agency-Specific Waivers</p>

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
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G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
	80%-50% Area Median Income	
	49%-30% Area Median Income	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.

Alternative Verification Hierarchy

Agency Specific Waiver

Activity Description

This activity waives HUD PIH Notice 2018-18 and successor notices to allow NHHFA to utilize an alternative streamlined method to verify household income for all HCV households. Once this waiver is approved, implementation would begin at the next annual or interim recertification to be conducted.

This activity will support the cost effectiveness of the MTW statutory objectives

1. Alter the verification hierarchy to the following:

Level	Verification Technique	Ranking
1	Up front income verification using HUD's EIV & IVT	Highest (Mandatory)
2	Upfront income verification no HUD system	Highest (Optional)
3	Written third party Verification OR written third party verification form OR Oral third-party verification	High (mandatory)
4	Self-Certification	High (Optional)

2. Extend the time that verifications are valid: for applicants, verifications may not be more than 180 days old at the time of voucher issuance.
3. For fixed income applicants and clients (Social Security award letters, fixed pensions, and VA benefits, etc.) verifications are valid for the full calendar year in which they are effective.

Impact analysis

1. Impact on NHHFA's finances
 - a. This is a cost/revenue neutral activity. This will assist staff in streamlining activities which will result in reduced staff time.
2. Impact on affordability of housing costs for affected families
 - a. There will no impact on the housing costs for households
3. Impact on NHHFA's waiting list
 - a. It is not anticipated that there will be any impact to the waiting list.
4. Impact on the termination rate of families
 - a. It is not anticipated that there will be any impact to the termination rate for families.
5. Impact on NHHFA's current occupancy level in the HCV program
 - a. It is not anticipated that there will be any impact to occupancy level in the HCV program.

6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, or housing choice
 - a. Implementation of this activity will increase the cost effectiveness of program operations and staff time.
7. Impact on NHHFA's ability to meet statutory requirements
 - a. This activity does not impact our ability to ensure that 75% of all new admissions are at or below 50% of the Area Median Income. NHHFA believes this is part of establishing a reasonable rent policy to encourage work and self-sufficiency of participating families. NHHFA will monitor new admissions and current participants to ensure continued assistance for substantially the same total number of eligible low-income households with MTW designation as without MTW designation. In addition, NHHFA will closely monitor assisted households to assure continual assistance to a comparable mix of household by family size. Lastly, this activity has no negative impact on NHHFA's ability to ensure all housing assisted under the MTW demonstration meets Housing Quality Standards
8. Across the other factors above, the impact on protected classes
 - a. NHHFA can ensure there will not be an impact on protected classes or any disparate impact. NHHFA will monitor the program to ensure that these programs do not adversely affect participation in, benefits of, or otherwise discriminate against persons on the basis of race, color, national origin, sex, religion, familial status, or disability or other protected bases. NHHFA's programs shall be operated in a manner that is consistent with the requirements of nondiscrimination and equal opportunity authorities and will be accessible to persons with disabilities in accordance with the Fair Housing Act, section 504 of the Rehabilitation Act, Titles II and III of the Americans with Disabilities Act, as applicable, and the Architectural Barriers Act.

Hardship Impact

This policy is not projected to create a hardship for any program households. No household will experience an increase in rent as a result of a change in the verification process.

However, if a household can verify that the verification process poses a financial hardship then NHHFA will review the request and, if approved, will use standard verification processes.

NEW HAMPSHIRE HOUSING FINANCE AGENCY (NHHFA)

MTW HARDSHIP POLICY

NHHFA is committed to the MTW Statutory Objectives to reduce cost, achieve greater cost effectiveness, give incentives to families who become economically self-sufficient and increase housing choices for eligible low-income families. NHHFA will adopt and implement the following activities listed below to achieve those objectives. The Hardship Policy is in place to determine when a requirement or provision of an MTW activity constitutes a financial or other hardship for the family. Through this process NHHFA will review households' individual circumstances and respond accordingly.

General Hardship Policies

NHHFA has developed conditions-based hardship policies as described below to address and mitigate financial hardships which may occur at enrollment or at any time during program participation. NHHFA's general hardship policies are outlined below:

- NHHFA will review its hardship policies with families during intake and recertification and will consider if a household qualifies for a hardship exemption at the time of a potential termination of assistance that is due to an MTW activity.
- There is no limit to the number of hardships that a household may receive. If a household is approved for a hardship, and subsequently experiences another adverse event while still in hardship status, they may request an additional hardship.
- **Records:** NHHFA will retain records of all hardship requests received and the results of these requests and supply them at HUD's request. NHHFA will retain this information for the duration of NHHFA's participation in the MTW demonstration program and make such information available for public review and inspection at NHHFA's principal office during normal business hours.
- **Reasonable Accommodations:** When needed, NHHFA will modify its policies and procedures to accommodate the needs of a person with disabilities if it will not impose an undue financial or administrative burden or will result in a fundamental alteration in the nature of the program. NHHFA will follow the guidance outlined in its Administrative Plan pertaining to reasonable accommodations for persons with disabilities.

Hardship Process

Households who request a hardship will be subject to the hardship process outlined below:

- All hardship requests must be made in writing stating both the reason for the hardship and the expected duration.
- Upon submission of a hardship request NHHFA will request verification of the hardship from the household. The hardship application will be considered complete once the household submits all requested supporting documentation.
- Upon submission of a complete hardship application the NHHFA will suspend the MTW activity for the household, beginning the next month after the request, until NHHFA has made a determination and has notified the household of the outcome of the request.

- All hardship requests will be reviewed by NHHFA's MTW Coordinator and/or other designated staff person, who will consult with the Director of Program Operations as needed.
- NHHFA will make a determination within fifteen (15) business days from the date of the completed hardship application.
- If it is determined that the household meets the hardship standards, NHHFA will notify the household in writing and will provide/continue to provide an exemption from the MTW activity. Approved hardships will remain in place for the time period established according to the activity, at which time the household must reapply for hardship. If the household does not reapply or is not approved for a continued hardship, the rent will be re-calculated according to the pre-hardship conditions.
- If it is determined that the household does not meet the hardship standards, NHHFA will notify the household in writing and will resume the MTW activity and collect any retroactive rent, if applicable, through a reasonable repayment agreement. NHHFA may also make referrals to other local resources to assist the household.
- **Grievance Procedure:** If a hardship request is denied, NHHFA will provide the household with an opportunity to request an informal hearing for a second level review of the denied hardship request, consistent with NHHFA's informal hearing procedures as outlined in the HCV Administrative Plan.

Determining Eligibility for Financial Hardship

In order to be approved for a financial hardship the family must meet the following criteria:

- a. The family has experienced a decrease in income because of changed circumstances, including loss or reduction of employment, death in the family, or reduction in or loss of earnings or other assistance; or
- b. The family has experienced an increase in expenses, because of changed circumstances, for medical costs, childcare, transportation, education, or similar items;
- c. The family is paying (or is projected to be paying) greater than 40% of monthly adjusted income towards rent and tenant-responsible utilities (based on NHHFA's utility allowance); and
- d. The change is expected to last longer than sixty (60) days.

Note: Either (a) OR (b) must be true AND both (c) and (d) must be true, as listed above.

Impact analysis Initial rent burden

1. Impact on NHHFA's finances
 - a. This is a cost/revenue neutral activity.
2. Impact on affordability of housing costs for affected families
 - a. This activity will allow families greater choices in their housing selections and costs.
3. Impact on NHHFA's waiting list
 - a. It is not anticipated that there will be any impact to the waiting list.
4. Impact on the termination rate of families
 - a. It is not anticipated that there will be any impact to the termination rate for families.
5. Impact on NHHFA's current occupancy level in the HCV program
 - a. This activity may increase the current occupancy level in the HCV program by allowing families more choices in their housing costs.
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, or housing choice
 - a. Implementation of this activity is helps families promote self-sufficiency and will increase their housing choice.
7. Impact on NHHFA's ability to meet statutory requirements
 - a. This activity does not impact NHHFA's ability to ensure that 75% of all new admissions are at or below 50% of the Area Median Income. NHHFA believes this is part of establishing a reasonable rent policy to encourage work and self-sufficiency of participating families. NHHFA will monitor new admissions and current participants to ensure continued assistance for substantially the same total number of eligible low-income households with MTW designation as without MTW designation. In addition, NHHFA will closely monitor assisted households to assure continual assistance to a comparable mix of household by family size. Lastly, this activity has no negative impact of NHHFA's ability to ensure all housing assisted under the MTW demonstration meets Housing Quality Standards
8. Across the other factors above, the impact on protected classes
 - a. NHHFA will ensure there will not be an impact on protected classes or any disparate impact. NHHFA will monitor the program to ensure that these programs do not adversely affect participation in, benefits of, or otherwise discriminate against persons on the basis of race, color, national origin, sex, religion, familial status, or disability or other protected classes. NHHFA's programs shall be operated in a manner that is consistent with the requirements of nondiscrimination and equal opportunity authorities and will be accessible to persons with disabilities in accordance with the Fair Housing Act, section 504 of the Rehabilitation Act, Titles II and III of the Americans with Disabilities Act, as applicable, and the Architectural Barriers Act.

Impact analysis alternative reexamination schedule

1. Impact on NHHFA's finances
 - a. This waiver will have a large impact on staffing and increasing the cost effectiveness of the program. Industry standards for staff time to complete a recertification is on average 2 hours per household. By expanding recertifications to a triennial schedule it will save approximately 16,800 hours in staff time over a 3-year period.
2. Impact on affordability of housing costs for affected families
 - a. There will no impact on the housing costs for households
3. Impact on NHHFA's waiting list
 - a. It is not anticipated that there will be any impact to the waiting list.
4. Impact on the termination rate of families
 - a. It is not anticipated that there will be any impact to the termination rate for families.
5. Impact on NHHFA's current occupancy level in the HCV program
 - a. This activity may increase the current occupancy level in the HCV program by allowing families to select market rate housing.
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, or housing choice
 - a. Implementation of this activity will increase the cost effectiveness of program operations and staff time.
7. Impact on NHHFA's ability to meet statutory requirements
 - a. This activity does not impact NHHFA's ability to ensure that 75% of all new admissions are at or below 50% of the Area Median Income. NHHFA believes this is part of establishing a reasonable rent policy to encourage work and self-sufficiency of participating families. NHHFA will monitor new admissions and current participants to ensure continued assistance for substantially the same total number of eligible low-income households with MTW designation as without MTW designation. In addition, NHHFA will closely monitor assisted households to assure continual assistance to a comparable mix of household by family size. Lastly, this activity has no negative impact on NHHFA's ability to ensure all housing assisted under the MTW demonstration meets Housing Quality Standards
8. Across the other factors above, the impact on protected classes
 - a. NHHFA can ensure there will not be an impact on protected classes or any disparate impact. NHHFA will monitor the program to ensure that these programs do not adversely affect participation in, benefits of, or otherwise discriminate against persons on the basis of race, color, national origin, sex, religion, familial status, or disability or other protected bases. NHHFA's programs shall be operated in a manner that is consistent with the requirements of nondiscrimination and equal opportunity authorities and will be accessible to persons with disabilities in accordance with the Fair Housing Act, section 504 of the Rehabilitation Act, Titles II and III of the Americans with Disabilities Act, as applicable, and the Architectural Barriers Act.

Impact analysis 2b Payment standards-FMR (HCV)

1. Impact on NHHFA's finances
 - a. It is hard to determine the exact amount of HAP that will be spent. When determining payment standards for the yearly budget, costs are anticipated and used to determine affordability as well as market costs and impacts to households.
2. Impact on affordability of housing costs for affected families
 - a. There will no impact on the housing costs for households
3. Impact on NHHFA's waiting list
 - a. It is not anticipated that there will be any impact to the waiting list.
4. Impact on the termination rate of families
 - a. It is not anticipated that there will be any impact to the termination rate for families.
5. Impact on NHHFA's current occupancy level in the HCV program
 - a. This activity may increase the current occupancy level in the HCV program by allowing families to select market rate housing.
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, or housing choice
 - a. Implementation of this activity will increase their housing choice and allow NHHFA to set the payment standard according to current market conditions.
7. Impact on NHHFA's ability to meet statutory requirements
 - a. This activity does not impact NHHFA's ability to ensure that 75% of all new admissions are at or below 50% of the Area Median Income. NHHFA believes this is part of establishing a reasonable rent policy to encourage work and self-sufficiency of participating families. NHHFA will monitor new admissions and current participants to ensure continued assistance for substantially the same total number of eligible low-income households with MTW designation as without MTW designation. In addition, NHHFA will closely monitor assisted households to assure continual assistance to a comparable mix of household by family size. Lastly, this activity has no negative impact on NHHFA's ability to ensure all housing assisted under the MTW demonstration meets Housing Quality Standards
8. Across the other factors above, the impact on protected classes
 - a. NHHFA can ensure there will not be an impact on protected classes or any disparate impact. NHHFA will monitor the program to ensure that these programs do not adversely affect participation in, benefits of, or otherwise discriminate against persons on the basis of race, color, national origin, sex, religion, familial status, or disability or other protected bases. NHHFA's programs shall be operated in a manner that is consistent with the requirements of nondiscrimination and equal opportunity authorities and will be accessible to persons with disabilities in accordance with the Fair Housing Act, section 504 of the Rehabilitation Act, Titles II and III of the Americans with Disabilities Act, as applicable, and the Architectural Barriers Act.

Impact analysis Minimum Rent

1. Impact on NHHFA's finances
 - a. NHHFA will generate an additional revenue of approximately \$100,236 which will be used to assist in building the asset building program.
2. Impact on affordability of housing costs for affected families

	Non-Elderly/ Non-Disabled
Total Number of Households	837
Annual Total HAP	
Baseline	\$10,893,684
Proposed	\$10,793,448
Change in Annual Total HAP	(\$100,236)
Average Family Share	
Baseline	\$486
Proposed	\$496
Change in Average Family Share	(\$10)
Impact on Tenant	
Households with No Change	661
Households with a Decrease	0
Average Decrease	-N/A-
Households with an Increase	176
Average Increase	\$47
Dollar Increase	
\$1 to 10	2
\$11 to \$25	6
\$26 to \$50	168

3. Impact on NHHFA's waiting list
 - a. It is not anticipated that there will be any impact to the waiting list.
4. Impact on the termination rate of families
 - a. It is not anticipated that there will be any impact to the termination rate for families.
5. Impact on NHHFA's current occupancy level in the HCV program
 - a. It is not anticipated that there will be any impact to the current occupancy level.

6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and or housing choice
 - a. Implementation of this activity is cost effective. It also helps families promote self-sufficiency as they will need to make a financial contribution towards their rent.
7. Impact on the NHHFA's ability to meet statutory requirements
 - a. This activity does not impact NHHFA's ability to ensure that 75% of all new admissions are at or below 50% of the Area Median Income. NHHFA believes this is part of establishing a reasonable rent policy to encourage work and self-sufficiency of participating families. NHHFA will monitor new admissions and current participants to ensure continued assistance for substantially the same total number of eligible low-income households with MTW designation as without MTW designation. In addition, NHHFA will closely monitor assisted households to ensure continual assistance to a comparable mix of household by family size. Lastly, this activity has no negative impact on NHHFA's ability to ensure all housing assisted under the MTW demonstration meets Housing Quality Standards
8. Across the other factors above, the impact on protected classes
 - a. NHHFA will ensure there will not be an impact on protected classes or any disparate impact. NHHFA will monitor the program to ensure that these programs do not adversely affect participation in, benefits of, or otherwise discriminate against persons on the basis of race, color, national origin, sex, religion, familial status, or disability or other protected classes. NHHFA's programs will be operated in a manner that is consistent with the requirements of nondiscrimination and equal opportunity authorities and will be accessible to persons with disabilities in accordance with the Fair Housing Act, Section 504 of the Rehabilitation Act, Titles II and III of the Americans with Disabilities Act, as applicable, and the Architectural Barriers Act.

Resident Advisory Board Comment

The Resident Advisory Board (RAB) consists of 28 Housing Choice Voucher participants throughout the community who were contacted by email and volunteered to participate in this year's Moving to Work Proposal. There were six RAB members who met online to discuss each waiver.

All members were provided with a matrix diagram, explaining each MTW waiver, the populations impacted, goals/opportunities expected and the impact on the program. Members also reviewed the hardship policy and how it would impact people. RAB members thought it was fair and had no other comments.

1. Minimum Rent - \$50 (Implemented within 90 days for household's with TTP below \$50)

Concur: Members agreed that this would have an adjustment period for some clients, but it is a fair change. One RAB member mentioned that some people might need education around paying any amount of rent if they have never had to do this in the past. Education around budgeting and building credit would be beneficial as well.

2. Initial Rent Burden – 40% to 45%

Concur: Members agreed that this change would open more apartments at initial lease up and help get participants into units. The members shared concerns that it could tighten budgets for those participants and make future rent increases more difficult for them to afford.

3. Alternative Income Inclusions/Exclusions (exclude gift income from the gross income calculation for all assisted households)

Concur: Members agreed that this is a beneficial waiver and had no other comments or concerns.

4. Payment standards -fair market rents (between 80% - 120% of the FMR)

Concur: Members noted a change in payment standard due to household composition change is difficult for families.

5. Alternative Reexamination Schedule (recertify on a triennial basis)

Concur: Members agreed that this waiver makes sense for the participants and the staff.

6. Self-Certification of Assets (up to \$50,000)

Members had no comments or concerns

7. Landlord Leasing Incentives

Encourages landlord acceptance of vouchers, develops, and strengthens relationships, and improves the voucher holder's ability to lease up. Program provides landlords who execute a one-year minimum lease with:

- **One-time \$1,000 incentive for a new landlord**
- **Participating Landlords receive up to \$500 for every new lease (excluding contract renewals).**

Concur: Members requested information about how effective the landlord incentive has been effective in gaining and retaining new landlords.

8. Pre-Qualifying Unit Inspections (Inspect vacant units that are voucher and occupancy ready)

Members supported this waiver, no comments or concerns noted.

9. Alternative Inspection Schedules (every 3 years)

Members had no comments or concerns

10. Short-Term Assistance (NHHFA may create a short-term housing assistance program with supportive services)

Members want to continue to hear about a possible short term Assistance program and agreed there is a need in the community.

11. Increase PBV Program Cap

Members had no comments or concerns

12. Increase PBV Project Cap

Members had no comments or concerns

13. Limit Portability for PBV Units (Waive the requirement to provide a tenant-based voucher at 12-months and increase the requirement to not more than 24-months.)

Members supported this waiver, no comments or concerns noted.

14. MTW Self-Sufficiency Program

Members had no comments or concerns

15. Alternative Income Verification Hierarchy (Utilize an alternative streamlined method to verify household income.)

Members had no comments or concerns

16. Copy of Lease not required

Members had no comments or concerns

17. Earned Income Disallowance (Eliminates future EIDs)

Members had no comments or concerns

18. Asset limit (Applicants will be ineligible at admission if they have more than \$100,000 in net assets or have a present ownership interest in a suitable home.)

Members had no comments or concerns

19. Opt-Out Savings Option for 500 participants providing a monthly deposit of \$25 per participant over a 24-month period

Concur: RAB members were in favor of the Opt-Out Savings Option. They wanted to understand how we select families. Members had all favorable comments and no concerns.

A member of the RAB, reached out a few days after our meeting to reiterate how happy she was to be part of the process even though she did not have the same amount of experience on the program as some of the others. She also wanted to say again that she supports New Hampshire Housing's efforts to improve the Voucher Program efficiencies and turning those efficiencies into real help for the needy.

Public Hearing Comments

The public hearings were held on February 15, 2023. Two members of the resident advisory board came to the hearing. One stated that she did not agree with our proposed activity to exclude gift income. She felt that someone could be receiving \$1,000 or more a month that would not be considered income which did not seem fair.

NHHFA's response to Resident Advisory Board comments

Minimum Rent - \$50 (Implemented within 90 days for household's with TTP below \$50)

Concur: Members agreed that this would have an adjustment period for some clients, but it is a fair change. One RAB member mentioned that some people might need education around paying any amount of rent if they have never had to do this in the past. Education around budgeting and building credit would be beneficial as well.

Response: NHHFA will provide budgeting and case management to clients affected by the minimum rent.

Payment standards -fair market rents (between 80% - 120% of the FMR)

Concur: Members noted a change in payment standard due to household composition change is difficult for families.

Response: There is no change from our current policy. Payment standards are adjusted according to HUD regulation.

Landlord Leasing Incentives

Encourages landlord acceptance of vouchers, develops, and strengthens relationships, and improves the voucher holder's ability to lease up. Program provides landlords who execute a one-year minimum lease with:

- **One-time \$1,000 incentive for a new landlord**
- **Participating Landlords receive up to \$500 for every new lease (excluding contract renewals).**

Concur: Members requested information about how effective the landlord incentive has been effective in gaining and retaining new landlords.

Response: NHHFA will update the members with the current information at the next RAB meeting.

Opt-Out Savings Option for 500 participants providing a monthly deposit of \$25 per participant over a 24-month period

Concur: RAB members were in favor of the Opt-Out Savings Option. They wanted to understand how we select families. Members had all favorable comments and no concerns.

Response: NHHFA will use an auto generated selection system.

Public Hearing Comments

The public hearings were held on February 15, 2023. Two members of the resident advisory board came to the hearing. One stated that she did not agree with our proposed activity to exclude gift income. She felt that someone could be receiving \$1,000 or more a month that would not be considered income which did not seem fair.

Upon review of this comment, we removed this activity from the draft plan and notified the commenter in writing that we will continue to include gift income.

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

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

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

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

New Hampshire Housing Finance Authority

NH901

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).

Christopher Norwood

Board Chairperson

NAME OF AUTHORIZED OFFICIAL

TITLE



3/23 ^{ce} 3/30/2023

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.*