

# PHA Name : Portsmouth RHA

**PHA Code :** VA001

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

**PHA Program Type:** Combined

**MTW Cohort Number:** Stepped and Tiered Rent

**MTW Supplement Submission Type:** Annual Submission

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

The Portsmouth Redevelopment and Housing Authority has identified three primary goals that will drive its MTW activities and further the federal MTW statutory goals. These goals will be our focus in the 2023 Plan year.

Goal 1 - Operational Efficiency through Innovation - Streamline business processes and implement advanced technological solutions that will result in operational cost efficiencies and enable reallocation of resources to local initiatives and strategies.

Cost Effective Activities to be implemented in Year 1

1. Rent Reform
2. Alternate Inspection Requirements
3. Alternate Verification Hierarchy
4. Simplified Utility Allowances

Goal 2 - Self-Sufficiency - Provide alternate incentives designed to motivate families to actively seek financial independence and transition from dependency on housing subsidy. Carefully measure success of each incentive to identify and replicate the greatest motivators.

Self-Sufficiency Activities to be implemented in Year 1

1. Rent Reform
2. Family Independence Initiative

Goal 3 - Expand Housing Opportunities – Complete the conversion of all remaining Public Housing; redevelop existing public housing sites and develop new housing in areas of opportunity throughout the City of Portsmouth.

Expanding Housing Opportunities to be implemented in Year 1

1. Local Project Based Voucher Program
2. Local Payment Standards
3. Landlord Incentive Program
4. Local Homeownership Program
5. Housing Development

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

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

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

### C. MTW Activities Plan that Portsmouth RHA Plans to Implement in the Submission Year or Is Currently Implementing

<b>1.c. - Stepped Rent (PH)</b>
As part of the cohort specific Rent Reform Study, PRHA will implement stepped rents for eligible Public Housing households as outlined by HUD in the Stepped Rent Policies. The stepped rent MTW activity will determine total tenant payment based on a fixed schedule versus household income. The intent of the stepped rent activity is to enable households to retain any increase in income, thus, providing incentives and improved opportunity for self-sufficiency.
<b>This MTW activity serves the following statutory objectives:</b>
Cost effectiveness;Self-sufficiency
<b>This MTW activity has the following cost implications:</b>
Increased expenditures;Decreased expenditures
<b>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.</b>
The MTW activity applies only to a subset or subsets of assisted households
<b>This MTW activity applies to:</b>
New admissions and currently assisted households
<b>An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).</b>
The MTW activity applies only to selected family types
<b>This MTW activity requires a Hardship Policy. The Hardship Policy is attached.</b>
<b>Attached Hardship policy applies to:</b> 1.c. - Stepped Rent (PH);1.d. - Stepped Rent (HCV);2.a. - Payment Standards- Small Area Fair Market Rents (HCV);3.a. - Alternative Reexamination Schedule for Households (PH);3.b. - Alternative Reexamination Schedule for Households (HCV)}
<b>No hardship were requested in the most recent fiscal year.</b>
<b>In the prior year, under this activity, Portsmouth RHA MTW agency</b>
Received 0 hardship requests
Approved hardship requests
Denied hardship requests
There is\are hardship requests pending.
<b>This MTW activity requires an Impact Analysis. The Impact Analysis is attached.</b>
<b>The Impact Analysis that applies to this MTW activity also applies to the following MTW activities:</b> 1.c. - Stepped Rent (PH);1.d. - Stepped Rent (HCV);2.a. - Payment Standards- Small Area Fair Market Rents (HCV);3.a. - Alternative Reexamination Schedule for Households (PH);3.b. - Alternative Reexamination Schedule for Households (HCV)
PRHA will use the 2022 Fair Market Rents as the baseline for determination of the Stepped Rents. PRHA will use the

midpoint increase of 3% of the Fair Market Rent as the "step" amount to be applied annually regardless of income. The step amount will remain fixed for the full six years of the Rent Test Study and will not be adjusted if FMR's change.

All households that are eligible for the study will be randomly assigned to either the "stepped rent group or the "standard group" using a computerized random assignment process. Households assigned to the standard group will continue to pay rent in accordance with standard HUD requirements for the duration of the rent study (6 years).

Household income will be calculated using retrospective adjusted annual income for the twelve-month period ending 120 days prior to the first recertification date. The annual income to be used is the traditional calculation of adjusted income. Income will continue to be defined in accordance with applicable regulations and all income exclusions continue to apply.

The first rent amount will be calculated based on 30% of the adjusted retrospective income calculated as described above. A minimum rent of \$50 will apply. The household's rent will automatically increase each year by the applicable "step" amount in the chart above.

The Step Rent is total tenant payment and a utility allowance will apply for tenant paid utilities. Utility Housing Assistance Payments will also remain applicable under the Rent Reform. PRHA will utilize a single standard utility allowance for all programs and all housing types.

PRHA will conduct triennial recertification to determine continued eligibility. If a Public Housing household is over income at anytime, the standard over-income procedures will apply. The PH guidance for over-income households will continue to supersede the stepped rent policies. The "last step" in Public Housing is when the TTP is equal to the applicable flat rent.

Interim recertifications will be conducted only for increases in rent to owner and changes in family composition.

Rent calculations for new admissions will be calculated based on 30% of current adjusted income. All other policies stated above will apply.

**Please see the attached stepped rent schedule.**

**If a household progresses all the way through the stepped rent schedule,**

Other\Not Applicable.

When a household's stepped rent reaches the flat rent, the household's rent amount will not increase any further.

#### **1.d. - Stepped Rent (HCV)**

As part of the cohort specific Rent Reform study, PRHA will implement the Stepped Rent Activity for qualified Housing Choice Voucher participants as specified in the HUD Stepped Rent study. The Stepped Rent activity will increase the household's TTP based on a fixed schedule and not household income. The Stepped Rent activity is intended to allow households to retain increased income providing incentives and opportunities to increase self-sufficiency.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness; Self-sufficiency

**This MTW activity has the following cost implications:**

Increased expenditures; Decreased expenditures

**An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

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

**This MTW activity applies to:**

New admissions and currently assisted households

**An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).**

The MTW activity applies only to selected family types

**This MTW activity applies to the following housing choice voucher unit types:** This activity applies to both all tenant based units and properties with project based vouchers.

**This MTW activity requires a Hardship Policy. The Hardship Policy is attached.**

**Attached Hardship policy applies to:**

1.c. - Stepped Rent (PH);1.d. - Stepped Rent (HCV);2.a. - Payment Standards- Small Area Fair Market Rents (HCV);3.a. - Alternative Reexamination Schedule for Households (PH);3.b. - Alternative Reexamination Schedule for Households (HCV)}

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Portsmouth RHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**This MTW activity requires an Impact Analysis. The Impact Analysis is attached.**

**The Impact Analysis that applies to this MTW activity also applies to the following MTW activities:**

1.c. - Stepped Rent (PH);1.d. - Stepped Rent (HCV);2.a. - Payment Standards- Small Area Fair Market Rents (HCV);3.a. - Alternative Reexamination Schedule for Households (PH);3.b. - Alternative Reexamination Schedule for Households (HCV)

PRHA will use the 2022 Fair Market Rents as the baseline for determination of the Stepped Rents. PRHA will use the midpoint increase of 3% of the Fair Market Rent as the "step" amount to be applied annually regardless of income. The step amount will remain fixed for the full six years of the Rent Test Study and will not be adjust if FMR's change.

All households who are eligible for the study will be randomly assigned to either the "stepped rent group" or the "standard group" using a computerized random assignment process. Households assigned to the standard group will continue to pay rent in accordance with standard HUD requirements for the duration of the rent study (6 years).

Household income will be calculated using retrospective adjusted annual income for the twelve-month period ending 120 days prior to the first recertification date. The annual income to be used is the traditional calculation of adjusted income. Income will continue to be defined in accordance with applicable regulations and all income exclusions continue to apply.

The actual amount received during the retrospective period will be counted as annual income unless the income was from TANF; SSI; SSDI or Unemployment Income and that income ended during the retrospective period. Sporadic income will be counted unless it is income that was received less than a total of 10 days throughout a calendar year. Court ordered child support will be considered as income based on the actual amount received during the retrospective period. Income from assets will only be considered if total combined assets exceed \$50,000.

The first rent amount will be calculated based on 30% of the adjusted retrospective income calculated as described above. A minimum rent of \$50 will apply. The household's rent will automatically increase each year by the applicable "step" amount in the chart above.

Triennial recertification will be conducted for study group households to determine continued eligibility.

If a household's retrospective adjusted income results in zero HAP at the first recertification following study enrollment, then the standard six-month zero HAP period would apply. If the household income exceeds 120% of AMI at a subsequent triennial eligibility recertification, the standard six month zero HAP period would apply.

Interim recertifications will be conducted only for increases in rent to owner and changes in family composition.  
**Please see the attached stepped rent schedule.**

**If a household progresses all the way through the stepped rent schedule**

Other\Not Applicable.

When a voucher household's stepped rent reached the point where they have zero HAP, the standard zero HAP rules will apply.

**1.i. - Alternative Utility Allowance (PH)**

The Portsmouth Redevelopment and Housing Authority will utilize a single utility allowance schedule for tenant paid utilities for all structure types in both the Public Housing and Housing Choice Voucher Programs. The utility allowance will be based on bedroom size of the unit in the Public Housing Program and the size of the Voucher in the HCV Program.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness

**This MTW activity has the following cost implications:**

Neutral (no cost implications)

**An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

The MTW activity applies to all assisted households

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Portsmouth RHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

The Portsmouth Redevelopment and Housing Authority will utilize a single utility allowance schedule for tenant paid utilities for all structure types in both the Public Housing and Housing Choice Voucher Programs. The utility allowance will be based on bedroom size of the unit in the Public Housing Program and the size of the Voucher in the HCV Program.

The utility allowance schedule will be calculated using the average consumption and costs for all utility types. PRHA will utilize a third-party vendor to review the utility allowance schedule each year. If the average consumption and/or costs have increased or decreased by more than 10% from the previous year, the schedule of allowances will be updated to reflect current consumption and costs.

**1.j. - Alternative Utility Allowance (HCV)**

The Portsmouth Redevelopment and Housing Authority will utilize a single utility allowance schedule for tenant paid utilities for all structure types in both the Public Housing and Housing Choice Voucher Programs. The utility allowance will be based on bedroom size of the unit in the Public Housing Program and the size of the Voucher in the HCV Program.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness



**This MTW activity has the following cost implications:**

Neutral (no cost implications)

**An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

The MTW activity applies to all assisted households

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Portsmouth RHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

The utility allowance schedule will be calculated using the average consumption and costs for all utility types. PRHA will utilize a third-party vendor to review the utility allowance schedule each year. If the average consumption and/or costs have increased or decreased by more than 10% from the previous year, the schedule of allowances will be updated to reflect current consumption and costs.

**2.a. - Payment Standards- Small Area Fair Market Rents (HCV)**

The Portsmouth Redevelopment and Housing Authority will adopt local MTW Payment Standards that are not less than 80% nor more than 150% of the HUD Small Area Fair Market Rent for the applicable zip codes.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Housing choice

**This MTW activity has the following cost implications:**

Increased expenditures

**An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

The MTW activity applies to all assisted households

**This MTW activity requires a Hardship Policy. The Hardship Policy is attached.**

**Attached Hardship policy applies to:**

1.c. - Stepped Rent (PH);1.d. - Stepped Rent (HCV);2.a. - Payment Standards- Small Area Fair Market Rents (HCV);3.a. - Alternative Reexamination Schedule for Households (PH);3.b. - Alternative Reexamination Schedule for Households (HCV)}

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Portsmouth RHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**This MTW activity requires an Impact Analysis. The Impact Analysis is attached.**

**The Impact Analysis that applies to this MTW activity also applies to the following MTW activities:**

1.c. - Stepped Rent (PH);1.d. - Stepped Rent (HCV);2.a. - Payment Standards- Small Area Fair Market Rents (HCV);3.a. - Alternative Reexamination Schedule for Households (PH);3.b. - Alternative Reexamination Schedule for Households (HCV)

**The following describes the payment standards by ZIP code or 'grouped" ZIP codes:** The Portsmouth Redevelopment and Housing Authority will identify Primary Real Estate Submarkets (PRESM's) within the City. PRHA will utilize a third-party firm to conduct a market study to identify the rental submarkets and to complete a rent survey that will identify the actual market rents within each submarket. A separate payment standard schedule will be adopted for each PRESM based on the 75th percentile of the market rents for that submarket provided that the payment standard is not less than 80% nor more than 150% of the HUD Small Area Fair Market Rent for the applicable zip codes within the PRESM.

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

The Portsmouth Redevelopment and Housing Authority will utilize the MTW flexibility to perform rent reasonableness determination on Project Based and Tenant Based Voucher units that are owned, controlled or managed by PRHA or a related affiliate.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Housing choice

**This MTW activity has the following cost implications:**

Neutral (no cost implications)

**An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

The MTW activity applies to all assisted households

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Portsmouth RHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**Following will explain quality assurance method:**

For quality assurance purposes, a staff supervisor will review all rent reasonable determinations by staff for PRHA controlled units with tenant-based vouchers. Documentation will include a worksheet that identifies all key criteria of comparable units with the subject unit that provides justification for the rent amount. **and attached for quality assurance method**

**Following will explain rent reasonableness determination method:**

PRHA will utilize the third-party market studies submitted to lenders and investors for new projects to be developed under the PBV program. Rent for existing PBV properties and for owner requested rent increases, will be based on the market rate rent in the property, if applicable, with no further comparison required. For properties with no market rate units, PRHA will secure a property specific rent comparability study.

In the Tenant Based Voucher Program, PRHA will assure that the rent charged for PRHA controlled units is never higher than the applicable amount under the MTW Alternate Payment Standards. PRHA will review the average rent for similar properties within its voucher program when determining the reasonableness of the rent charged for PRHA controlled units.  
**and attached for rent reasonableness determination method**

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

In accordance with the Stepped Rent Activity, PRHA will conduct triennial recertification for all households that are randomly selected for the Study Group.

#### **This MTW activity serves the following statutory objectives:**

Cost effectiveness;Self-sufficiency

#### **This MTW activity has the following cost implications:**

Decreased expenditures

#### **An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

The MTW activity applies to all assisted households

#### **This MTW activity requires a Safe Harbor Waiver.**

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

#### **This MTW activity requires a Hardship Policy. The Hardship Policy is attached.**

##### **Attached Hardship policy applies to:**

1.c. - Stepped Rent (PH);1.d. - Stepped Rent (HCV);2.a. - Payment Standards- Small Area Fair Market Rents (HCV);3.a. - Alternative Reexamination Schedule for Households (PH);3.b. - Alternative Reexamination Schedule for Households (HCV)}

#### **No hardship were requested in the most recent fiscal year.**

#### **In the prior year, under this activity, Portsmouth RHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

#### **This MTW activity requires an Impact Analysis. The Impact Analysis is attached.**

##### **The Impact Analysis that applies to this MTW activity also applies to the following MTW activities:**

1.c. - Stepped Rent (PH);1.d. - Stepped Rent (HCV);2.a. - Payment Standards- Small Area Fair Market Rents (HCV);3.a. - Alternative Reexamination Schedule for Households (PH);3.b. - Alternative Reexamination Schedule for Households (HCV)

#### **Recertification Schedule is**

Once every three years

**Household may request 0 interim recertifications per year.**

Rather than providing an interim recertification, pursuant to the Stepped Rent policies, the family may request a hardship under PRHA's Hardship Policy if they experience a decrease in income that will create a rent burden in excess of 40% of the household's current monthly adjusted income.

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

In accordance with the Stepped Rent Activity, PRHA will conduct triennial recertifications for households randomly selected for the Stepped Rent study.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Self-sufficiency

**This MTW activity has the following cost implications:**

Decreased expenditures

**An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

The MTW activity applies to all assisted households

**This MTW activity requires a Safe Harbor Waiver.**

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

**This MTW activity requires a Hardship Policy. The Hardship Policy is attached.**

**Attached Hardship policy applies to:**

1.c. - Stepped Rent (PH);1.d. - Stepped Rent (HCV);2.a. - Payment Standards- Small Area Fair Market Rents (HCV);3.a. - Alternative Reexamination Schedule for Households (PH);3.b. - Alternative Reexamination Schedule for Households (HCV)}

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Portsmouth RHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**This MTW activity requires an Impact Analysis. The Impact Analysis is attached.**

**The Impact Analysis that applies to this MTW activity also applies to the following MTW activities:**

1.c. - Stepped Rent (PH);1.d. - Stepped Rent (HCV);2.a. - Payment Standards- Small Area Fair Market Rents (HCV);3.a. - Alternative Reexamination Schedule for Households (PH);3.b. - Alternative Reexamination Schedule for Households (HCV)

**Recertification Schedule is**

Once every three years

**Household may request 0 interim recertifications per year.**

Rather than providing an interim recertification, pursuant to the Stepped Rent policies, the family may request a hardship under PRHA's Hardship Policy if they experience a decrease in income that will create a rent burden in excess of 40% of the household's current monthly adjusted income.

### **3.c. - Self-Certification of Assets (PH)**

The Portsmouth Redevelopment and Housing Authority will implement a self-certification process for all households in the Public Housing and Housing Choice Voucher Programs when the total household assets are less than \$50,000 (fifty thousand dollars).

PRHA will provide applicants and participating households with a standardized certification form to be completed at the time of admission or recertification

#### **This MTW activity serves the following statutory objectives:**

Cost effectiveness

#### **This MTW activity has the following cost implications:**

Decreased expenditures

#### **An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

The MTW activity applies to all assisted households

#### **No hardship were requested in the most recent fiscal year.**

#### **In the prior year, under this activity, Portsmouth RHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

#### **The dollar threshold for the self-certification of assets is**

\$50,000.

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

The Portsmouth Redevelopment and Housing Authority will implement a self-certification process for all households in the Public Housing and Housing Choice Voucher Programs when the total household assets are less than \$50,000 (fifty thousand dollars).

PRHA will provide applicants and participating households with a standardized certification form to be completed at the time of admission or recertification.

#### **This MTW activity serves the following statutory objectives:**

Cost effectiveness

#### **This MTW activity has the following cost implications:**

Decreased expenditures

**An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

The MTW activity applies to all assisted households

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Portsmouth RHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**The dollar threshold for the self-certification of assets is**

\$50,000.

#### **4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)**

The Portsmouth Redevelopment and Housing Authority will provide an incentive payment to new landlords that have not previously participated in the Housing Choice Voucher Program.

The incentive payment will be equal to one month's contract rent and will be paid upon execution of a Housing Assistance Payments Contract.

**This MTW activity serves the following statutory objectives:**

Housing choice

**This MTW activity has the following cost implications:**

Neutral (no cost implications)

**An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

The MTW activity applies to all assisted households

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Portsmouth RHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**This policy applies to Certain types of units only (Display selected and additional Pop up is complex logic.)**

**The types of units policy applies to:**

Units/landlords new to the HCV program
<b>Maximum payment to the landlord is</b> \$One month contract rent..
<b>payments were issued under this policy y in the most recently completed PHA fiscal year.</b>
<b>\$ issued under this policy in the most recently completed PHA fiscal year.</b>

<b>5.c. - Third-Party Requirement (HCV)</b>
The Portsmouth Redevelopment and Housing Authority will utilize the MTW flexibility to perform Housing Quality Standards (HQS) inspections on Project Based and Tenant Based Voucher units that are owned, controlled or managed by PRHA or a related affiliate.
For quality assurance purposes, a staff supervisor will conduct quality controls inspections for 20% of all inspections completed by staff for PRHA controlled units with Project Based or Tenant Based vouchers.
<b>This MTW activity serves the following statutory objectives:</b> Cost effectiveness
<b>This MTW activity has the following cost implications:</b> Decreased expenditures
<b>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.</b> The MTW activity applies to all assisted households
<b>No hardship were requested in the most recent fiscal year.</b>
<b>In the prior year, under this activity, Portsmouth RHA MTW agency</b> Received 0 hardship requests  Approved hardship requests  Denied hardship requests  There is\are hardship requests pending.
<b>The quality assurance method:</b> <b>Following will explain the quality assurance method</b> – For quality assurance purposes, a staff supervisor will conduct quality controls inspections for 20% of all inspections completed by staff for PRHA controlled units with Project Based or Tenant Based vouchers If [Upload file] options- Display 'Attached for quality assurance method"

<b>5.d. - Alternative Inspection Schedule (HCV)</b>
The Portsmouth Redevelopment and Housing Authority will utilize an alternate inspection schedule. All Housing Choice Voucher units will be inspected on a triennial basis.
Interim inspections will be conducted upon request of a program participant or a report from a third-party entity such as the code enforcement department or social service agency indicating concerns with the condition of the unit.
In order to achieve the highest level of operational efficiency, PRHA will stagger the implementation of this activity over three years to ensure that the numbers of inspections are scheduled evenly over the execution period.
<b>This MTW activity serves the following statutory objectives:</b>

Cost effectiveness

**This MTW activity has the following cost implications:**

Decreased expenditures

**An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

The MTW activity applies to all assisted households

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Portsmouth RHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**9.a. - Increase PBV Program Cap (HCV)**

The Portsmouth Redevelopment and Housing Authority will develop and implement a local MTW Project Based Program that will include the activities listed below.

Increased Program Cap - PRHA will increase the Project Based Voucher Program cap to up to 50% of its baseline voucher allocation. Exempt units described in PIH 2017-21 will continue to be exempt from the MTW 50% cap.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Housing choice

**This MTW activity has the following cost implications:**

Decreased expenditures

**An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

The MTW activity applies to all assisted households

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Portsmouth RHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**50.00% of total authorized HCV units will be authorized for project-basing.**



**9.b. - Increase PBV Project Cap (HCV)**

The Portsmouth Redevelopment and Housing Authority will develop and implement a local MTW Project Based Program that will include the activities listed below.

Increase in Project Cap - PRHA will increase the Project Based Voucher Program project cap to up to 100% of units in a project regardless of project type. Projects serving families will not be required to provide supportive services to project based up to 100% of the units.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Housing choice

**This MTW activity has the following cost implications:**

Decreased expenditures

**An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

The MTW activity applies to all assisted households

**No hardship were requested in the most recent fiscal year.****In the prior year, under this activity, Portsmouth RHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

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

The Portsmouth Redevelopment and Housing Authority will develop and implement a local MTW Project Based Program that will include the activities listed below.

Elimination of Selection Process - PRHA will eliminate the selection process in the award of Project Based Vouchers to a property owned by a sole asset entity that is an affiliate of and controlled by PRHA. Such projects shall be subject to site selection requirements; subsidy layering approval; and HQS inspections performed by an independent entity.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Housing choice

**This MTW activity has the following cost implications:**

Decreased expenditures

**An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

The MTW activity applies to all assisted households

**No hardship were requested in the most recent fiscal year.****In the prior year, under this activity, Portsmouth RHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

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

The Portsmouth Redevelopment and Housing Authority will develop and implement a local MTW Project Based Program that will include the activities listed below.

Portability Limit - PRHA will provide a Choice Mobility voucher to a participant that has resided in a Project Based Voucher for a minimum of 24 months. A PBV participant may request a Choice Mobility voucher at the second anniversary of their PBV lease agreement. The property management agent for the PBV property must certify that the tenant is in compliance with all terms and conditions of their lease agreement and their PBV family obligations. Upon approval from the management agent, the request will be placed on the Choice Mobility waiting list. Choice Mobility applicants will be offered tenant based vouchers as available based on the date of request. If not approved, participants shall be entitled to a review of the denial pursuant to the review process outlined in the Administrative Plan.

#### **This MTW activity serves the following statutory objectives:**

Cost effectiveness; Housing choice

#### **This MTW activity has the following cost implications:**

Decreased expenditures

#### **An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

The MTW activity applies to all assisted households

#### **No hardship were requested in the most recent fiscal year.**

#### **In the prior year, under this activity, Portsmouth RHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

#### **10.d.PH - Modify or Eliminate the Contract of Participation (PH)**

The Portsmouth Redevelopment and Housing Authority will eliminate the Family Self-Sufficiency (FSS) Program Contract of Participation and replace the traditional FSS escrow calculation with a flat payment system to address increases in family income.

The Family Independence Initiative (FII) will provide a self-sufficiency continuum that is integrated and holistic, designed to assist individuals to acquire the skills and competencies to secure a sustainable wage. PRHA's current self-sufficiency program connects residents with an array of support services. However, the traditional FSS Program incentivizes individuals through an escrow created only as a result of increased earned income. Recognizing that self-sufficiency is achieved through economic mobility PRHA's FII Program will provide intermediate financial incentives for self-initiated activities such as continued education, technical training certifications; complying with a personal budget and increased credit scores; and securing new employment with higher sustainable wages.

A local agreement will be implemented that articulates PRHA's goals for its FII program. The new agreement will address

revised escrow earnings based on the intermediate financial incentives. A fixed schedule of values will be established for each self-initiative. Payment will be made to the participant's escrow upon successful completion of the corresponding goal. The escrow account will be paid in full only upon graduation from the FSS program. Non-compliance with the FSS program requirements as well as the termination from the public housing or voucher programs will result in forfeiture of the escrow.

Graduation from the FSS program will be defined as suitable employment maintained for six consecutive months and that no one in the household is no longer receiving any TANF benefits. Suitable employment will be negotiated with each participant and stated in the agreement upon execution of the agreement.

Current FSS participants will be provided with the option of remaining in the traditional FSS program until graduation under the current requirements or transferring to the Family Independence Initiative. If a family chooses to transfer to the FII program, their accumulated escrow will transfer as well.

**This MTW activity serves the following statutory objectives:**

Self-sufficiency

**This MTW activity has the following cost implications:**

Neutral (no cost implications)

**An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

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

**This MTW activity applies to:**

Currently assisted households only

**An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).**

The MTW activity applies to all family types

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Portsmouth RHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**10.d.HCV - Modify or Eliminate the Contract of Participation (HCV)**

The Portsmouth Redevelopment and Housing Authority will eliminate the Family Self-Sufficiency (FSS) Program Contract of Participation and replace the traditional FSS escrow calculation with a flat payment system to address increases in family income.

The Family Independence Initiative (FII) will provide a self-sufficiency continuum that is integrated and holistic, designed to assist individuals to acquire the skills and competencies to secure a sustainable wage. PRHA's current self-sufficiency program connects residents with an array of support services. However, the traditional FSS Program incentivizes individuals through an escrow created only as a result of increased earned income. Recognizing that self-sufficiency is achieved through economic mobility PRHA's FII Program will provide intermediate financial incentives for self-initiatives such as continued education, technical training certifications; complying with a personal budget and increased credit scores; and securing new employment with higher sustainable wages.

A local agreement will be implemented that articulates PRHA's goals for its FII program. The new agreement will address revised escrow earnings based on the intermediate financial incentives. A fixed schedule of values will be established for each self-initiative. Payment will be made to the participant's escrow upon successful completion of the corresponding goal. The escrow account will be paid in full only upon graduation from the FSS program. Non-compliance with the FSS program requirements as well as the termination from the public housing or voucher programs will result in forfeiture of the escrow.

Graduation from the FSS program will be defined as suitable employment maintained for six consecutive months and that no one in the household is no longer receiving any TANF benefits. Suitable employment will be negotiated with each participant and stated in the agreement upon execution of the agreement.

Current FSS participants will be provided with the option of remaining in the traditional FSS program until graduation under the current requirements or transferring to the Family Independence Initiative. If a family chooses to transfer to the FII program, their accumulated escrow will transfer as well.

**This MTW activity serves the following statutory objectives:**

Self-sufficiency

**This MTW activity has the following cost implications:**

Neutral (no cost implications)

**An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

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

**This MTW activity applies to:**

Currently assisted households only

**An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).**

The MTW activity applies to all family types

**This MTW activity applies to the following housing choice voucher unit types:** This MTW activity applies to all tenant based and project based vouchers that participate in the FSS program.

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Portsmouth RHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**17.c. - Housing Development Programs**

The Portsmouth Redevelopment and Housing Authority will utilize MTW funding to expand affordable housing in the City of Portsmouth through acquisition, substantial rehabilitation and/or new construction of single-family and multi-family housing units. Funds will be used as secondary financing for tax credit projects with PRHA Project Based Vouchers.

**An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

The MTW activity applies to all assisted households

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Portsmouth RHA MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**Table 17.c.1 - Housing Development Programs that the MTW Agency plans to commit Funds to in Fiscal Year**

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Lexington II	New Construction	GAP Financing	72.00	72.00	72.00	0.00	0.00	0.00
Swanson Redevelopment	New Construction	GAP Financing	100.00	200.00	100.00	0.00	0.00	0.00

**Housing Development Programs that the MTW Agency plans to spend funds on in the Fiscal Year**

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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**Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year**

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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**Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year**

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<b>Safe Harbor Waivers seeking HUD Approval:</b> Please see attached for Safe Harbor Waivers requested this year.

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>
<b>E.1</b>	<b>Agency-Specific Waiver(s) for HUD Approval:</b>  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, Agency-Specific Waivers may be requested.  Please see attached for Agency-Specific Waiver(s) requested this year.
<b>E.2</b>	<b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b> MTW Agency does not have approved Agency-Specific Waivers

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

<b>Federal Fiscal Year (FFY)</b>	<b>Total Operating Subsidy Authorized Amount</b>	<b>How Much PHA Disbursed by the 9/30 Reporting Period</b>	<b>Remaining Not Yet Disbursed</b>	<b>Deadline</b>
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<b>G.</b>	<b>MTW Statutory Requirements.</b>	
<b>G.1</b>	<b>75% Very Low Income – Local, Non-Traditional.</b> HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	<b>Income Level</b>	<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
	80%-50% Area Median Income	
	49%-30% Area Median Income	
	Below 30% Area Median Income	
	Total Local, Non-Traditional Households	<b>0</b>

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

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>

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

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

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

<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.	
<b>Occupied Number of Local, Non-Traditional units by</b>	



<b>Family Size:</b>	<b>Household Size</b>
1 Person	
2 Person	
3 Person	
4 Person	
5 Person	
6+ Person	
Totals	<b>0</b>

<b>H.</b>	<b>Public Comment</b>
	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.
	No additional public hearing was held for an Agency-Specific Waiver and/or Safe Harbor waiver

<b>I.</b>	<b>Evaluations.</b>
	No known evaluations.

# PORTSMOUTH REDEVELOPMENT AND HOUSING AUTHORITY

## MOVING TO WORK SUPPLEMENT 2022-2023

### HARDSHIP OVERVIEW

The Portsmouth Redevelopment and Housing Authority recognizes that several policies implemented under the Moving to Work flexibilities may have an adverse impact on some households. This hardship policy is designed to minimize any negative impact the MTW policies may have on assisted households.

The chart below identifies the MTW activities that could negatively impact assisted families and the groups to which the hardship for each activity will apply.

Hardship Policy	Study Group	Standard Group	Excluded Group
Hardship Process	✓	✓	✓
Rent Burden at Enrollment	✓		
Rent Burden after Enrollment	✓		
Stepped Rent Reset for Sustained Hardships	✓		
Full-time Student Hardship	✓		
Payment Standards	✓	✓	✓
Alternate Re-certifications	✓	✓	✓
Alternative Verification Hardship	✓	✓	✓

**Study Group** – Non-elderly, non-disabled households randomly selected and not otherwise excluded, from the Stepped Rent study. Rent for these households will be determined based on the Stepped Rent policy described in Activity 1a and 1 b in the MTW Supplement.

**Standard Group** - Non-elderly, non-disabled households NOT randomly selected and not otherwise excluded, from the Stepped Rent study. Rent for these households will be based on the standard HUD rent calculation regulations.

**Excluded Group** - All elderly, disabled, traditional FSS and special purpose vouchers as well as households who become or will become elderly or disabled during the six year study period are excluded from the random selection. Where special purpose vouchers are concerned, PRHA will apply MTW policies to the extent that such policies are not in conflict with the applicable NOFA. In the event of a conflict, the NOFA will govern.

**New Admissions** – Households newly admitted to the Public Housing and HCV programs after the commencement of the Stepped Rent study, will be randomly selected at the time of admission.

A hardship review committee which will consist of non-property management staff will be established by PRHA that will be responsible for the review and approval or

denial of all hardship requests received under this policy.

This hardship policy presents eligibility criteria and remedies for different types of hardships. The different types of hardships below are not mutually exclusive. If a household's circumstances correspond to more than one type of hardship, they will receive the hardship most beneficial to them.

## **HARDSHIP POLICIES**

PRHA will review its hardship policies with families during initial eligibility and triennial recertifications. PRHA will review all proposed program terminations/eviction for non-payment of rent and consider if a household qualifies for a hardship exemption prior to a final termination or eviction.

- There is no limit to the number of hardships that a household may request and 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 that might impact their total tenant payment (TTP).
- If a household is approved for a hardship, they are not required to report subsequent income increases during the period of their approved hardship; the hardship rent will remain in effect until the end of the time period approved for the hardship.
- If a household is approved for a temporary hardship, when that hardship is scheduled to expire the household will be notified and may request an extension. When a hardship expires, the household will return to paying the stepped rent, including any annual stepped rent TTP increases that occurred during the period of the hardship.
- If the head of household, spouse, or co-head of household becomes elderly or disabled, the household is eligible to be excluded from the stepped rent and return to the traditional income-based rent policy.

## **HARDSHIP REQUEST AND APPROVAL PROCESS**

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

- All hardship requests must be in writing with the exception of automatic hardship processed by PRHA during the income certification that takes place at initial enrollment. If the head of household is unable to put a request in writing due to a physical or mental impairment, PRHA staff will provide assistance.

- When a household makes a written request for a hardship exemption from a required MTW activity, PRHA will request verification of the hardship. If the head of household is unable to put a request in writing due to a physical or mental impairment, PRHA staff will provide assistance.
- Households will be required to provide verification of the hardship within 14 calendar days from the date of the hardship request.
- Within 14 calendar days from receipt of verification of the hardship, PRHA's hardship committee will make a determination in writing as to whether or not to grant the hardship.
- Approved hardships will take place on the first of the month after the hardship is approved. If there is a delay in determining the hardship, through no fault of the household, PRHA will make the hardship TTP retroactive to the first of the month following receipt of the verified request.
- The hardship TTP will be calculated consistent with applicable PRHA hardship policies described further below and will remain in effect for the period of time for which the hardship has been granted.
- If a hardship request is denied, PRHA will provide the household with an opportunity to request an in-person informal review within ten (10) business days for a second level review of the denied hardship request. The household can have legal counsel present at the hearing.
- If a hardship continues beyond the initial approval period and the household does not reapply or is not approved for a continued hardship, the rent will revert back to the pre-hardship stepped rent TTP, plus any annual stepped rent TTP increases that were scheduled to take effect during the hardship period.
- PRHA will retain records of all hardship requests received and the results of these requests and supply them at HUD's request. PRHA will retain this information for the duration of PRHA's participation in the MTW demonstration program and make such information available for public review and inspection at PRHA's principal office during normal business hours.

## **HARDSHIP TYPES, CRITERIA AND REMEDIES**

**Stepped Rent Childcare Expenses** – This hardship type applies only to households enrolled in the Stepped Rent demonstration. Households that are eligible for a Childcare Expense hardship type will receive a permanent TTP reduction, by “resetting” their stepped rent TTP.

1. **Enrollment** - When a household converts from the standard rent calculation to the stepped rent policy and had more than \$2,500 of childcare deductions at their

previous recertification, and the household continues to pay more than \$2,500 in childcare, PRHA will deduct the actual childcare expenses from their current gross income before setting the year 1 stepped rent.

**2. Hardship Request** – Any household that did not have more than \$2,500 in childcare at the time of establishing their initial step rent and subsequently has more than \$2,500 in childcare expenses may request a hardship.

- A household may not receive a hardship for childcare deduction more than twice over the 6-year period of the Stepped Rent demonstration. If a household has already received this hardship exemption once, they will be eligible for a second stepped rent reset if their eligible childcare expenses have increased by at least \$2,500 since the last time their stepped rent was reset.
- PRHA will subtract the eligible childcare deductions from the household's current gross income and calculate a new TTP at the higher of the minimum rent or 30% of that childcare-adjusted income. This will not be a temporary hardship; it will apply for 12 months, and establish a new base on which future stepped rent annual increases will be applied.

**High Rent Burden** – This hardship type applies only to households enrolled in the Stepped Rent demonstration. Households participating in the stepped rent will be eligible for a temporary hardship exemption if the stepped rent causes a rent burden above 40% of their annual gross income.

- 1. Enrollment** - When a household converts from the standard rent calculation to the stepped rent policy PRHA will conduct a recertification. If the household's current gross income is lower than their retrospective gross income and their TTP will exceed 40% of their monthly gross income, the household will automatically qualify for a hardship exemption.
- 2. Hardship Request** – PRHA will review the Enterprise Income Verification System (EIV) and at any time other than the recertification at conversion the household's TTP will exceed 40% of their monthly gross income, the household will be notified that they can request a hardship exemption. This request must be made in accordance with the procedures set forth above.
  - PRHA will set equal the households TTP to to 40% of their current gross monthly income or the minimum rent, whichever is greater.
  - The hardship exemption under this criterion will be for a temporary period of ninety days. The household may request an extension or reapply for another hardship under this criteria

**Sustained Hardships** - This hardship type applies only to households enrolled in the Stepped Rent demonstration. If a hardship is approved on a temporary basis based on rent burden and the family has been granted extension of the temporary hardship and the hardship condition continues for 12 consecutive months, PRHA's hardship review committee will determine on a case-by-case basis if the stepped rent will be reset.

- PRHA will calculate a new stepped rent TTP at the higher of the minimum rent or 30% of prior year/retrospective gross income. The resulting TTP will apply for 12 months and will establish a new base on which future stepped rent annual increases will be applied. This action will establish a new annual cycle for the household's stepped rent increases.

**Other Circumstances** - This hardship policy applies to all MTW activities listed in the chart on page one. A household may request a hardship exemption for other circumstances not outlined above. PRHA will consider these requests on a case-by-case basis and decisions will be made by the hardship review committee.

- The hardship review committee will determine if the circumstances are beyond the household's control and make it difficult for the household to pay the stepped rent TTP, and whether a temporary rent reprieve is necessary.
- If it is determined that a hardship does exist, PRHA will set the household's TTP to a flat \$100 for one month

**PORTSMOUTH REDEVELOPMENT AND HOUSING AUTHORITY**  
**MOVING TO WORK SUPPLEMENT 2022-2023**

<b>IMPACT ANALYSIS</b>	
<b>MTW Activity – Tenant Rent Policies Agency Specific Waiver</b>	<b>1c and 1d – Stepped Rents Alternate Verification Hierachy</b>
<b>1. Impact on PRHA Finances</b>	
This activity is not expected to impact finances; it is estimated that average per unit cost of housing subsidy in the HCV program will decrease over time and allow PRHA to support other MTW activities and/or increase utilization.	
<b>2. Affordability of Housing Costs for affected families.</b>	
Housing costs are expected to increase for some households and decrease for others. However, the hardship policies in effect will minimize any extreme impact for families. Households with increased income will benefit significantly as their rent will no longer be tied to income and thus, they will could have more disposable income for other needs.	
<b>3. Wait List</b>	
This activity will have no impact on the wait list.	
<b>4. Termination Rate</b>	
This activity is not anticipated to impact the termination and/or eviction rate.	
<b>5. Occupancy Level in Public Housing and Utilization Rate in HCV</b>	
This activity will have no impact occupancy in Public Housing or utilization rate in HCV.	
<b>6. Meeting the MTW Goals of Cost Effectiveness, Self-Sufficiency or Expanding Housing Choice</b>	
Simplified rent policies impact both cost effectiveness and self-sufficiency. These activities will better prepare residents for private market housing in which rent is not tied to household income. In addition, residents will have the security of knowing exactly how much their rent is going to be for the next 6 years regardless of their income. The use of Stepped Rents will incentivize families towards economic independence and increase household income. As household income increases, the percent of income to rent decreases, reducing the family’s rent burden.	
<b>7. Impact on PRHA’s Ability to Meet MTW Statutory Goals</b>	
This activity is not anticipated to impact PRHA’s ability to meet statutory goals.	
<b>8. Impact on Rate of Hardship Requests</b>	
This activity is expected to result in multiple hardship requests, particularly as it relates to child care expense and decreases in income. Residents are accustomed to rent changes based on income changes. Implementation will require a significant education process so that participants understand that rent is no longer based on income.	
<b>9. Impact on Protected Classes and Associated Disparate Impact</b>	
Elderly and disabled households are exempt from Stepped Rent policies.	

<b>IMPACT ANALYSIS</b>	
<b>MTW Activity – Payment Standards and Rent Reasonableness</b>	<b>2a – Small Area Fair Market Rents</b>
<b>1. Impact on PRHA Finances</b>	
This activity is expected to increase the average per unit costs in the voucher program. However, PRHA will manage these increased costs through a higher voucher success rate which will assure maximum program utilization which has been unachievable without MTW flexibilities.	
<b>2. Affordability of Housing Costs for affected families.</b>	
This activity is not expected to impact the affordability of housing costs for voucher families.	
<b>3. Wait List</b>	
This activity will have no impact on the wait list.	
<b>4. Termination Rate</b>	
This activity is not anticipated to impact the termination and/or eviction rate.	
<b>5. Occupancy Level in Public Housing and Utilization Rate in HCV</b>	
This activity is expected to have a very positive impact on the utilization rate in the HCV program as rents will be more comparable with the real rents in the various locations throughout the City..	
<b>6. Meeting the MTW Goals of Cost Effectiveness, Self-Sufficiency or Expanding Housing Choice</b>	
This activity will have a positive impact on the meeting the MTW goals as it will significantly expand housing choice for voucher holders.	
<b>7. Impact on PRHA’s Ability to Meet MTW Statutory Goals</b>	
This activity is not anticipated to impact PRHA’s ability to meet statutory goals.	
<b>8. Impact on Rate of Hardship Requests</b>	
This activity is not expected to impact the rate of hardship requests.	
<b>9. Impact on Protected Classes and Associated Disparate Impact</b>	
This activity is not expected to impact any protected class and will have not disparate impact.	



<b>IMPACT ANALYSIS</b>	
<b>MTW Activity – Reexaminations</b>	<b>3a and 3b – Alternate Reexamination Schedule</b>
<b>1. Impact on PRHA Finances</b>	
This activity is expected to have an impact on finances through a slight increase in per unit costs in the voucher program. PRHA will offset this costs through savings that will result from reduced staff and administrative time.	
<b>2. Affordability of Housing Costs for affected families.</b>	
This activity will positively impact affordability for families as rent increases will only take effect at the triennial recertification. Families will be have increased disposable income for other needs.	
<b>3. Wait List</b>	
This activity will have no impact on the wait list.	
<b>4. Termination Rate</b>	
This activity is not anticipated to impact the termination and/or eviction rate.	
<b>5. Occupancy Level in Public Housing and Utilization Rate in HCV</b>	
This activity is not anticipated to impact occupancy or utilization rates.	
<b>6. Meeting the MTW Goals of Cost Effectiveness, Self-Sufficiency or Expanding Housing Choice</b>	
This activity will have a positive impact on the meeting the MTW goals as it will result in cost effectiveness for PRHA and provide additional self-sufficiency initiatives for the families as they have additional available income for two years without an increase in rent.	
<b>7. Impact on PRHA’s Ability to Meet MTW Statutory Goals</b>	
This activity is not anticipated to impact PRHA’s ability to meet statutory goals.	
<b>8. Impact on Rate of Hardship Requests</b>	
This activity is not expected to impact the rate of hardship requests.	
<b>9. Impact on Protected Classes and Associated Disparate Impact</b>	
This activity is not expected to impact any protected class and will have not disparate impact.	

**RESOLUTION 2022-60**

**RESOLUTION ADOPTING THE PORTSMOUTH  
REDEVELOPMENT AND HOUSING AUTHORITY'S  
ANNUAL AGENCY PLAN FOR FISCAL YEAR 2023 AND  
APPROVAL OF MOVING TO WORK SUPPLEMENT**

**WHEREAS**, Section 511 of the Quality Housing and Work Responsibility Act of 1998 (QHWRA) requires housing authorities to provide its residents, community and the Department of Housing and Urban Development a comprehensive agency plan that consists of a Five-Year Plan and an Annual Plan;

**WHEREAS**, the Annual Agency Plan provides a forum to present the policies and procedures of the Authority;

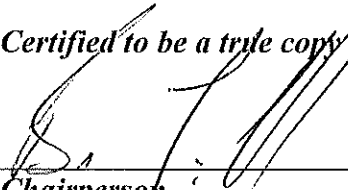
**WHEREAS**, the Portsmouth Redevelopment and Housing Authority was notified on May 6, 2021 that it was selected for admission to the Moving to Work Demonstration Program, Cohort #2: Rent Reform to study Stepped Rent;

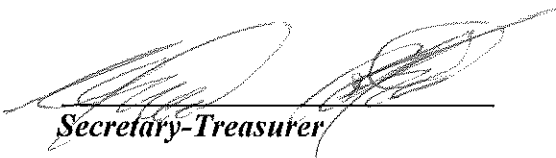
**WHEREAS**, participation in the Moving to Work Demonstration requires a Moving to Work Supplement to the Annual Agency Plan;

**WHEREAS**, PRHA posted the draft of the 2023 Annual Agency Plan and MTW Supplement to the Agency Plan on October 28, 2022, accepted public comments through December 13, 2022; and conducted a public hearing on December 12, 2022;

**NOW THEREFORE BE IT RESOLVED** that the Board of Commissioners of the Portsmouth Redevelopment and Housing Authority ("PRHA") do hereby approve the Annual 2023 Agency Plan and the Moving to Work Supplement as attached hereto and authorizes the Secretary of the Board of Commissioners to execute the MTW Certifications of Compliance.

*Certified to be a true copy of a resolution adopted on December 15, 2022.*

  
\_\_\_\_\_  
Chairperson

  
\_\_\_\_\_  
Secretary-Treasurer

Cc: Central Files  
(Seal)

**Board of Commissioners Meeting  
December 15, 2022**

The Commissioners of the Portsmouth Redevelopment and Housing Authority (PRHA) held their regularly scheduled meeting , in person, at 3116 South Street, Portsmouth, Virginia, on December 15, 2022 at 5:00 p.m. The meeting was called to order by Chair LaLonde, and upon roll call, those present were as follows:

Present:

Chair Bruce LaLonde  
Vice Chair Renee Wicks  
Commissioner Zeketa Cost  
Commissioner Cynthia Morgan  
Commissioner Clifton Pickens  
Commissioner Sean Prince  
Commissioner Stephanie Wright

Absent:

Staff Present:

Mr. Edward Bland, Executive Director  
Ms. Alisa S. Winston, Deputy Executive Director  
Mr. Ray Reyes, Chief Financial Officer  
Ms. Delores Adams, Director of Procurement and Resident Services  
Ms. Cathy Parker, Director of HCV Program  
Mr. Philip Page, Jr., Director of Development and Capital Funds  
Ms. Karen James, General Counsel  
Ms. Valzenia Jenkins, Director of Asset Management  
Ms. De'Lis Marshall, Executive Assistant

Others Present:

Mr. Brandon L. Ballard, Staff Attorney, Legal Aid Society of Eastern Virginia  
Mrs. DeAnna Smith, Outreach Fellow, Legal Aid Society of Eastern Virginia  
Mr. Darrell Richmond, CEO & Founder, Give Back 2 Da Block

Chair LaLonde presented the minutes from the November 10, 2022 Board Meeting.  
Commissioner Prince motioned to accept the minutes and Commissioner Wright seconded.

**Roll Call Votes:** Commissioner Cost-Yes; Commissioner Morgan- Yes; Commissioner Pickens- Yes; Commissioner Prince- Yes; Commissioner Wright-Yes; Vice Chair Wicks-Yes; and Commissioner LaLonde-Yes.

Chair LaLonde reminded the Board that they needed to approve the Move to Work (MTW) Supplement and the Five Year Agency Plan.

Ms. Winston reminded the Board that they previously approved the MTW Supplement and no changes were made since last approval. She gave a presentation on the 2023 Agency Plan along

**PORTSMOUTH REDEVELOPMENT AND HOUSING AUTHORITY**  
**MOVING TO WORK SUPPLEMENT 2023**

<b>PRHA FAIR MARKET RENTS - STEPPED RENTS</b>					
<b>Bedroom Size</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>
2022 FMR'S (10/1/2021 - 9/30/2022)	\$1,015	\$1,193	\$1,676	\$2,042	\$2,348
MIDPOINT INCREASE PER YEAR (3%)	\$30	\$36	\$50	\$61	\$70

STEPPED RENT SCHEDULE

<b>PRHA FAIR MARKET RENTS - STEPPED RENTS</b>					
<b>Bedroom Size</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>
2022 FMR'S (10/1/2021 - 9/30/2022)	\$1,015	\$1,193	\$1,676	\$2,042	\$2,348
MIDPOINT INCREASE PER YEAR (3%)	\$30	\$36	\$50	\$61	\$70

PORTSMOUTH REDEVELOPMENT AND HOUSING AUTHORITY  
MOVING TO WORK SUPPLEMENT 2022-2023

**AGENCY-SPECIFIC WAIVER REQUEST**

**ACTIVITY E-1 – ALTERNATE VERIFICATION HIERARCHY**

Under the Moving to Work (MTW) Operations Notice, MTW agencies are allowed to request Agency-Specific Waivers for activities that are not specifically included in Appendix I of the Operations Notice. The Portsmouth Redevelopment and Housing Authority is proposing to implement the following activity in both the Public Housing and Housing Choice Voucher (HCV) programs pursuant to an Agency-Specific Waiver.

**Narrative - Description of Proposed MTW Activity**

This activity will waive provisions of HUD PIH Notice 2018-18 and successor notices to allow PRHA to utilize an alternative, streamlined method to verify household member income for all Public Housing residents and HCV program participants (including both tenant-based and project-based programs). PRHA intends to implement this alternative method to streamline program administration and reduce administrative burdens to benefit both clients and the agency.

While PRHA intends to apply the alternative verification hierarchy across the board to its Public Housing and HCV programs, this waiver will also support the implementation of the Cohort #2 alternative rent policy evaluation initiative described in the MTW Supplement by facilitating the determination of retrospective income amounts.

This method has 3 changes to the current verification method:

1. Alter the verification hierarchy to the following:

<b>Level</b>	<b>Verification Technique</b>	<b>Ranking</b>
1	Upfront Income Verification using HUD's EIV System	Mandatory
2	Third Party Verification (Written or oral documented on a form and signed by PRHA staff)	High Supplement EIV Non-EIV reported income sources Disputes of EIV reported information
3	Self-Certification	High To supplement EIV when EIV reported sources do not contain verification of the full retrospective period where applicable; or When tenant cannot produce written third party verification documents.

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 or Public Housing move in. For tenants and participants, verifications for reexaminations may not be more than 180 days from the effective date. This policy is applicable when HC is verifying current/anticipated income.
3. In the case of fixed income verifications for applicants, tenants and participants (e.g., Social Security award letters, fixed pensions, etc.), verifications are valid for the full calendar year in which they are effective.

These changes to the verification method will reduce cost and achieve greater cost effectiveness in federal expenditures by decreasing administrative time spent on the verification process while still gathering appropriate information. PHA staff will be able to move through the verification levels more efficiently to provide proficient service to clients and reduce duplicate work. Extending the amount of time verifications are valid for will save time by not re-requesting verification from applicants, tenants and participants that has fallen out of date, but is still an accurate reflection of their current situation.

**MTW Statutory Objective** – This MTW activity serves the following statutory objectives: Cost Effectiveness.

**Cost Implications** – This activity will have no cost implications to PRHA’s annual budget.

**Different Policy by Household Status/Family Types** – This MTW activity will apply to all assisted households.

**Location/Site** – This activity will apply to the Public Housing and Housing Choice Voucher Program.

**Policy Impact Analysis** – The Impact Analysis for this policy is attached as Exhibit B.

**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 (~~7/1/2022~~ **1/1/23**), 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.

PORTSMOUTH REDEVELOPMENT AND HOUSING AUTHORITY

VA001

**MTW PHA NAME**

**MTW PHA NUMBER/HA CODE**

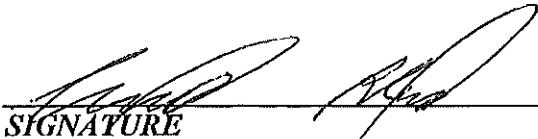
*I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C.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

Edward Bland

Executive Director

**NAME OF AUTHORIZED OFFICIAL**

**TITLE**

  
**SIGNATURE**

June 17, 2022

**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.*