

# PHA Name : Rockford Housing Authority

**PHA Code :** IL022

**MTW Supplement for PHA Fiscal Year Beginning :** (MM/DD/YYYY): 10/1/2022

**PHA Program Type:** Combined

**MTW Cohort Number:** Landlord Incentives

**MTW Supplement Submission Type:** Annual Submission

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

The Rockford Housing Authority (RHA) is located in Winnebago County, Illinois. The RHA administers both the Public Housing and Housing Choice Voucher (HCV) programs and affordable housing options to all eligible households regardless of race, color, religion, sex, physical or mental handicap, familial status, national origin, or other protected class. The RHA is committed to providing quality, affordable housing that enhances the lives of its residents and promotes their independence.

The RHA's mission is to create strategic partnerships with community stakeholders, design a diverse housing portfolio, and leverage social service programming to unite and ensure residents are provided with safe and nurturing environments that lead to self-sufficiency, responsibility, and individual empowerment.

The overall vision for the RHA's Moving to Work (MTW) program is to create a quality housing model that transforms families from poverty to prosperity while sustaining the financial viability of the authority through the implementation of efficient business processes. Additionally, the RHA will develop and implement a comprehensive, integrated, and coordinated service delivery model that combines housing, coaching and mentoring, life skills and empowerment, education, and workforce development.

As an MTW Agency, the Rockford Housing Authority (RHA) will be given the flexibility and authority to develop policies outside the limitations of certain HUD regulations and provisions. This will allow RHA to achieve its mission and program goals at a higher level by leveraging the unique needs and concerns of the community and residents of Winnebago County. The MTW Program will allow the RHA to combine resources permitting the use of HUD funds to address local program priorities and needs better. The flexibilities allowed through the Moving-to-Work Program will support the RHA's vision of empowering residents to achieve self-sufficiency by increasing family housing opportunities, supporting deconcentrating assisted families, encouraging greater landlord participation, promoting landlord retention, and reducing administrative burdens.

The agency will utilize the MTW funding regulatory flexibility waivers and landlord incentives to market and promote the HCV program to high-performing landlords in the city and county that have yet to utilize the voucher program or have underutilized the program.

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

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

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

### C. MTW Activities Plan that Rockford Housing Authority Plans to Implement in the Submission Year or Is Currently Implementing

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

The RHA will raise the payment standard to 120% of the Fair Market Rents (FMR). Housing choices are dwindling due to growing local market rents, limiting where RHA households can live. This activity is a remedy to this concern. The current RHA payment standard is 110% of the FMR. A payment of 120% of FMR will increase the payment standard by an average of \$105 for all bedroom sizes.

#### 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

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

N/A

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

No hardship were requested in the most recent fiscal year.

#### In the prior year, under this activity, Rockford Housing Authority 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.

#### Following will explain the payment standards by FMR:

Bedroom

Size Current

FMR Current

PS 120%

FMR-PS

0 \$555 \$611 \$666

1 \$635 \$699 \$762

2 \$836 \$920 \$1,003

3 \$1,140 \$1,254 \$1,368

4 \$1,214 \$1,335 \$1,457

#### 4.b. - Damage Claims (HCV-Tenant-based Assistance)

To incentivize a landlord's current participation in the HCV program, the RHA will allow owners to submit a damage claim of up to one month's contract rent. The amount of compensation may not exceed the lesser of the cost of damages or one month of contract rent. Damages must be documented by and accepted by the RHA.

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

Housing choice

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

Increased revenue; 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

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

N/A

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

**In the prior year, under this activity, Rockford Housing Authority MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**This policy applies to**

To all units

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

**Maximum payment to the landlord is**

\$The amount of compensation may not exceed the lesser cost of damages or one month of contract rent..

**0 payments were issued under this policy y in the most recently completed PHA fiscal year.**

**\$0 issued under this policy in the most recently completed PHA fiscal year.**

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

The RHA will implement a new sign-on bonus of up to \$1000 with a one-year contract beginning January 1, 2023. It has to be a new landlord that cannot be current or previous. They will also receive an additional \$250 for every five new units signed on. In addition to the current landlords, starting January 1, 2023, each new unit added will receive \$500 up to \$2500 while funding is available.

Safe Harbor Limit: The incentives payment to landlords for a new sign-on bonus must equal no more than one month of the contract rent.

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

Cost effectiveness;Housing choice

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

Increased revenue;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

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

N/A

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

**In the prior year, under this activity, Rockford Housing Authority MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**This policy applies to To all units (Display selected and additional Pop up is complex logic.)**

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

**Maximum payment to the landlord is**

\$Up to \$2500 while funding is available..

**0 payments were issued under this policy y in the most recently completed PHA fiscal year.**

**\$0 issued under this policy in the most recently completed PHA fiscal year.**

|            |   |
|------------|---|
| <b>D.</b>  | <b>Safe Harbor Waivers.</b>   |
| <b>D.1</b> | <b>Safe Harbor Waivers seeking HUD Approval:</b><br>No Safe Harbor Waivers are being requested. |

|            |  |
|------------|--|
| <b>E.</b>  | <b>Agency-Specific Waiver(s).</b>  |
| <b>E.1</b> | <b>Agency-Specific Waiver(s) for HUD Approval:</b><br><br>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.<br><br>No Agency-Specific Waivers are being requested. |
| <b>E.2</b> | <b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b><br>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> |
|----------------------------------|--|--|------------------------------------|-----------------|
| 2021                             | \$8,063,202                                      | \$8,063,202  | \$0                                |                 |
| 2022                             | \$7,887,799                                      | \$7,887,799  | \$0                                |                 |
| 2023                             | \$7,121,268                                      | \$7,121,268  | \$0                                |                 |
| 2024                             | \$5,065,221                                      | \$0  | \$5,065,221                        |                 |
| 2025                             | \$5,065,221                                      | \$0  | \$5,065,221                        |                 |



|            |   |   |
|------------|---|---|
| <b>G.</b>  | <b>MTW Statutory Requirements.</b>  |   |
| <b>G.1</b> | <b>75% Very Low Income – Local, Non-Traditional.</b><br>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  | 32  |
|            | 49%-30% Area Median Income  | 34  |
|            | Below 30% Area Median Income  | 111   |
|            | <b>Total Local, Non-Traditional Households</b>  | <b>177</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> |
| MTW agency established a rent reform policy to encourage employment and self-sufficiency |   |

|   |   |
|---|---|
| <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.              | 285 # 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. | 279 # 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>Family Size:</b> | <b>Occupied Number of Local, Non-Traditional units by Household Size</b> |
|---------------------|--|
| 1 Person            | 122  |
| 2 Person            | 83   |
| 3 Person            | 45   |
| 4 Person            | 22   |
| 5 Person            | 6  |
| 6+ Person           | 7  |
| <b>Totals</b>       | <b>285</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. |

**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 (10/1/2022), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

Rockford Housing Authority

IL022

**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).*

Jeffrey DiBenedetto

Chairman

**NAME OF AUTHORIZED OFFICIAL**

**TITLE**



12/12/22

**SIGNATURE**

**DATE**

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



**EXTRACT FROM DECEMBER 12, 2022 SPECIAL BOARD MEETING**

**Resolution #2022-029**

RESOLUTION THAT THE RHA BOARD OF COMMISSIONERS APPROVE THE MTW SUPPLEMENT PLAN AND SUBMISSION

Commissioner Dixon moved that the RHA Board of commissioners approve the MTW Supplement plan and submission. Commissioner Sanchez seconded the motion.

**Ayes:** Commissioners: Dixon, Sanchez, Grimmert, Wilson, DiBenedetto

**Nays:** None

**MOTION APPROVED**

**Chairman, Jeff DiBenedetto**

**Board Secretary, Laura Snyder**

## **ROCKFORD HOUSING AUTHORITY HARDSHIP POLICY**

The RHA has established a hardship policy to evaluate individual circumstances to address hardship exemption requests.

### **Applicable Family Situations**

Qualifying hardships include the following:

1. The family has experienced a decrease in income because of changed circumstances including,
  - a) Involuntary loss or reduction of employment
  - b) Death in the family
  - c) Involuntary reduction in or loss of earnings or other assistance
2. The family has experienced an increase in expenses because of changed circumstances, for
  - a) Medical costs that exceed 25% or more of the family's current expense
  - b) Childcare costs that exceed 25% or more of the family's current expense
  - c) Involuntary loss of transportation, such as a serious car accident
  - d) Education
  - e) Similar items
  - f) Such other situations and factors determined by the RHA to be appropriate.

### **Process for Agency Review and Determination**

When a client requests a hardship exemption from an MTW activity, the RHA will take the following actions:

Suspend the MTW activity beginning the next month after the request until the agency has determined if the request is warranted.

1. Determine whether a hardship exists within a reasonable time after the family request and whether it is temporary or long term.
2. The RHA will not evict the family during the 90-day period beginning the month following the family's request for a hardship exemption.
3. If it is determined that a financial or other hardship exists and is **TEMPORARY**, the RHA will continue providing an exemption from the MTW activity at a reasonable level for up to 90 days. After that time, the RHA will reinstate the MTW activity from the beginning of the suspension. The RHA will offer the family a reasonable repayment agreement, on terms and conditions established by the RHA for the amount of back rent owed by the family.
4. If it is determined that a financial or other hardship exists and is **LONG-TERM**, the RHA will continue providing an exemption from the MTW activity at a reasonable level for a specified duration determined by the RHA. After that time, the RHA will reinstate the MTW activity from the beginning of the suspension. The RHA will offer the family a reasonable repayment agreement on terms and conditions established by the RHA for the amount of back rent owed by the family.
5. If it is determined that a financial or other hardship request did not meet hardship standards, the client must resume the MTW activity and collect any retroactive rent, if applicable, through a reasonable repayment agreement.

### **Resident and Participant Notification**

The RHA will notify families of its Hardship Policy through its Administrative Plan, Admissions and Continued Occupancy Policy (ACOP), at intake, at recertification, and when a family is to be terminated due to an MTW activity.

### **Grievance Procedure**

If a family's hardship request is denied, the family is permitted to go before the Hearing Officer for a second review.

### **Reasonable Accommodations**

The RHA will address persons with handicaps requesting a reasonable accommodation under 24 CFR part 8 through the RHA's Reasonable Accommodations Policy and procedures.

**Record Keeping**

The RHA will keep clear records for hardship requests and determinations for three (3) years. These records are available for public review and inspection at the RHA's principal office during normal business hours and supplied to HUD if requested.

# IMPACT ANALYSIS



- a. **Agency Finances:** The impact on agency finances is projected to be neutral both in the short and long term. It is anticipated that the payment standard activity will increase the RHA's federal expenditures in terms of housing assistance payments (HAP). The average HAP is projected to increase by \$105 per family, per month. Augmenting the payment standard for FMR will expand housing choices for families and deconcentrate poverty.
- b. **Impact on affordability for affected families:** Families will, similarly, see an increase in their tenant rent portion; however, it will be insubstantial. Due to increases in local market rents, all families will see an increase in rent regardless of their income status.
- c. **Impact on waitlists:** The activity will not affect the waiting list.
- d. **Impact on occupancy rate for project-based voucher communities and utilization rate in the HCV Program:** Due to an increase in HAP, this activity may affect the agency's current utilization rate in the HCV program. It is the expectation that this activity will have a neutral effect on the HCV utilization rate when combined and implemented with the other RHA MTW activities.
- e. **Impact on the termination rate for families:** This activity will not affect the termination rate of families.
- f. **Impact on MTW statutory goals of cost effectiveness, self-sufficiency, and housing choice:**
  - o **Cost Effectiveness:** Offering monetary incentives to landlords for renting to voucher holders and retaining landlords would reduce the administrative burden in assisting voucher holders with housing search activities and may reduce the number of new inspections and paperwork. The landlord would also lose less rent while waiting for a new tenant to be processed. Monetary incentives would also likely increase landlord participation in the program and decrease the amount of time vouchers remained issued but not used. Housing Catalyst would continue offering non-monetary incentives such as excellent customer service and timely HAP payments.
  - o **Self-Sufficiency:** Using the MTW flexibilities to adjust payment standards would allow voucher holders to live in high opportunity areas they are currently priced out of; access to better schools; and job opportunities. This would equate to increased economic mobility for residents. It would allow program participants to be more competitive with market-rate tenants.
  - o **Housing Choice:** RHA is dedicated to exploring mortgage assistance and expanded homeownership programs. We believe homeownership is a key element in ending generational poverty. The use of MTW incentives to increase landlord participation and retention and expand housing options outside low-income or minority

concentration to increase the number of participating landlords would ultimately provide increased choice for voucher holders. The ability to use their vouchers would be enhanced, and the amount of time searching would be reduced.

- g. Impact on the agency's ability to meet the MTW statutory requirements:** Rockford housing Authority already has a strong commitment and track record for bringing collaborative and innovative projects to our community. With an MTW status, we would utilize MTW flexibility to align the needs of the community and residents with the (3) MTW statutory objectives in ways that help transform operations, encourage self-sufficiency, and better utilize the funding it receives.
- h. Impact on hardship requests:** The RHA does not expect to see an increase in hardship requests as a result of this activity.
- i. Impact on protected classes:** This waiver is implemented based on landlord incentives in which protected class is not a factor. Therefore, there is no anticipated impact on protected classes.

## **PROOF OF PUBLICATION**

Erin Vore  
ACCOUNTS PAYABLE  
Rockford Housing Authority  
223 S WINNEBAGO ST  
ROCKFORD IL 61102-2259

STATE OF ILLINOIS, COUNTY OF WINNEBAGO

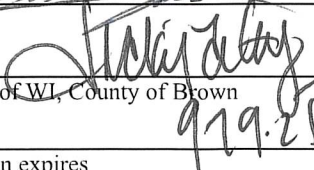
The Rockford Register Star, a secular newspaper, has been continuously published daily for more than fifty (50) weeks prior to the first publication of the attached notice, is published in the City of Rockford, County of Winnebago, Township of Rockford, State of Illinois, is of general circulation throughout that county and surrounding area, and is a newspaper as defined by 715 ILCS 5/5.

That the attached or annexed was published in the issue dated:

09/12/2022

and that the fees charged are legal.  
Sworn to and subscribed before on 09/12/2022

  
\_\_\_\_\_  
Legal Clerk

  
\_\_\_\_\_  
Notary, State of WI, County of Brown  
9/19/22

My commission expires

Publication Cost: \$166.80  
Order No: 7765569 # of Copies: 1  
Customer No: 636355  
PO #:

**THIS IS NOT AN INVOICE!**

*Please do not use this form for payment remittance.*

VICKY FELTY  
Notary Public  
State of Wisconsin

Public Hearing - MTW Supplemental Plan for Review  
NOTICE OF PUBLIC HEARING  
ROCKFORD HOUSING AUTHORITY  
MTW SUPPLEMENT PLAN  
The Rockford Housing Authority will host a in person and virtual public hearing on Thursday, October 27, 2022, at 3:00 p.m. to receive public comment on the RHA MTW Supplement Plan. The purpose of this hearing is to allow residents, landlords, program participants, agency partners, supportive service providers and the general public an opportunity to comment on the Authority's MTW Supplement Plan prior to submission to the Department of Housing and Urban Development.  
The MTW Supplement Plan identifies the Section 8 Housing Choice Voucher program waivers that the RHA will implement to incentivize landlord participation in the program, improve program performance, and enhance cost efficiencies.  
The Plan is available on our website at [www.rockfordha.org](http://www.rockfordha.org). A hard copy of the plan is available at RHA's central office, located at 223 South Winnebago Street, Rockford, IL 61102. Request for written copy can be made to [evore@rockfordha.org](mailto:evore@rockfordha.org) or by written request to RHA Chief Executive Officer, Laura Snyder, at the below address.  
Time: Thursday, October 27, at 3:00 PM Central Time  
In Person Location: 223 South Winnebago Street, Rockford, IL 61102  
The virtual public hearing can be attended via teleconference by logging into Zoom in the following manner:  
Join Zoom Meeting:  
Zoom, Com  
Dial by your location  
1 (346) 248-7799 US Meeting ID: 893 4633 4111; Passcode: 988097  
The public has the additional opportunity to express their concerns and comments in writing. Written comments must be received no later than Monday November 3, 2022, by email to: [evore@rockfordha.org](mailto:evore@rockfordha.org) with the subject "MTW Supplement Plan", or the United State Postal Service to the following address:  
Laura Snyder, Chief Executive Officer  
RE: MTW Supplement Plan  
Rockford Housing Authority  
223 South Winnebago Street  
Rockford, IL 61102