

PHA Name : Salt Lake City

PHA Code : UT004

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

PHA Program Type: Combined

MTW Cohort Number: Landlord Incentives

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The Housing Authority of Salt Lake City ("HASLC") will utilize MTW Flexibility to meet the three MTW statutory objectives of reducing costs and achieving greater cost effectiveness in federal expenditures, increasing self-sufficiency, and increasing housing choice for low-income families while advancing our mission of providing affordable housing opportunities in Salt Lake County. HASLC views our mission broadly to include providing support and resources to help our clients succeed.

HASLC's mission is increasingly urgent as Salt Lake County faces an affordable housing crisis not seen since WWII. Accelerated population growth without a corresponding increase in housing supply, along with skyrocketing rents, have only exacerbated an already critical situation.

HASLC plans to implement several activities in our first year of MTW participation that are included in this supplement. Longer term, we will continue to evaluate implemented activities and explore innovative solutions to achieve MTW's statutory objectives and meet agency, client, and community needs.

Reducing Costs and Achieving Greater Effectiveness in Federal Expenditures

HASLC plans to implement several activities to help streamline processes, lower administrative burdens, and reduce costs while achieving greater cost effectiveness in federal expenditures. These activities include self-certification of assets up to \$50,000, an alternative inspection schedule, streamlining the PBV selection process, and the elimination of third-party requirements for rent reasonableness determinations and inspections on HASLC-owned properties.

Increasing Self-Sufficiency

HASLC will encourage self-sufficiency in the near term by eliminating utility reimbursements and implementing a tiered rent policy and alternative reexamination schedule that will allow clients to keep income increases between reexaminations. These activities, along with the activities listed in the section above, also help decrease administrative burdens and allow staff to focus more time on client support.

Longer term, HASLC is exploring ways to leverage MTW flexibilities to expand our Family Self-Sufficiency and Homeownership programs.

Increasing Housing Choice

The high demand for housing in Salt Lake County has caused landlords to convert to market-rate rentals at an alarming rate. HASLC acted several years ago by creating its Landlord Outreach program to build strong relationships with landlords and assist clients with barriers that make it more difficult to get approved for housing. That program has been successful but needs to expand given the worsening affordable housing crisis in Salt Lake County.

To further support landlords and increase housing choice, HASLC plans to implement a variety of activities that will strengthen existing landlord relationships and help build new relationships with landlords who could benefit from participation in the HCV program. Our expanded program will leverage MTW flexibilities to streamline processes and provide funding to help alleviate common concerns landlords have when renting to HCV clients. These activities include offering waived initial inspections on certain units, pre-qualified unit inspections, vacancy loss payments, reimbursement for property damage claims, and additional security deposits for new landlords.

HASLC will also leverage MTW flexibility to increase housing choice by expanding our PBV program and increasing funding options for affordable housing. The selected activities include raising our PBV cap to 40%, increasing the PBV project cap to 100%, allowing PBV vouchers to be utilized for shared housing and manufactured housing, and utilizing funding to acquire, rehabilitate, and/or build affordable housing units that are not public housing.

We are confident that we can implement the selected activities in an effective and timely manner given our dedicated Board of Commissioners, strong community partnerships, and knowledgeable staff. We are excited to move forward as an MTW Agency and will continue to work with our staff, board, clients, and HUD to implement solutions to benefit our community.

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

1. Tenant Rent Policies	
b. Tiered Rent (HCV)	Plan to Implement in the Submission Year
n. Utility Reimbursements (HCV)	Plan to Implement in the Submission Year
2. Payment Standards and Rent Reasonableness	
d. Rent Reasonableness – Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
3. Reexaminations	
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
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
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
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Plan to Implement in the Submission Year
c. Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
d. Alternative Inspection Schedule (HCV)	Plan to Implement in the Submission Year
6. Short-Term Assistance	
7. Term-Limited Assistance	
8. Increase Elderly Age (PH & HCV)	
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Plan to Implement in the Submission Year
b. Increase PBV Project Cap (HCV)	Plan to Implement in the Submission Year
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Plan to Implement in the Submission Year
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Plan to Implement in the Submission Year
10. Family Self-Sufficiency Program with MTW Flexibility	
11. MTW Self-Sufficiency Program	
12. Work Requirement	
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
14. Moving on Policy	
15. Acquisition without Prior HUD Approval (PH)	
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	
c. Housing Development Programs	Plan to Implement in the Submission Year

C. MTW Activities Plan that Salt Lake City Plans to Implement in the Submission Year or Is Currently Implementing

1.b. - Tiered Rent (HCV)
HASLC plans to implement a tiered rent policy to simplify the rent calculation process and reduce administrative burdens. HASLC staff will reduce time spent on the certification process by completing biennial or triennial recertifications for most clients and determining rent using set income tiers for work-able HCV clients. These activities will also encourage self-sufficiency for work-able HCV clients because they will be able to keep more of their income between reexaminations if their income goes up.
Since most of HASLC’s Public Housing clients are elderly and / or disabled, the entire Public Housing program will be excluded from the new tiered rent policy. All elderly and disabled voucher holders, as well as all special purpose voucher

holders, will also be excluded.

Clients will be assigned a tier based on adjusted annual income. Current income exclusions as defined by HUD continue to apply. The household will be assigned a tier at recertification based on anticipated adjusted income. New households will be assigned a tier at the initial lease-up based on their anticipated adjusted income.

Tiers will be in \$2,500 increments (i.e., the lowest tier includes households with gross income between \$0 and \$2,499; the next tier includes households with gross income between \$2,500 and \$4,999; and so on). The maximum tier will go up to Salt Lake County's area median income. Each tier has a corresponding flat rent amount that is based on the lowest income in each band. Minimum rent will be set based on HASLC's current policy.

Tiered Rent schedules will be established annually within 90 days of that year's AMI being published by HUD.

HCV households renting a unit with gross rent above the payment standard would still be responsible for any rent above the payment standard.

Income increases generally won't need to be reported and wouldn't affect the household's tenant contribution until the next recertification, except zero-income households, FSS Program households, and Homeownership Program households must continue to report any increase of income within ten (10) business days of the increase and may have a corresponding increase to their tenant rent portion if they move into a higher income tier.

Households can submit as many interim requests as they would like. However, only income decreases that lower the tier will result in a rent reduction.

This MTW activity serves the following statutory objectives:

Cost effectiveness; Self-sufficiency

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 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 all units that are occupied by non-elderly, non-disabled households who do not have a special purpose voucher.

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.

New activity

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Salt Lake City MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

Tiers will be in \$2,500 increments (i.e., the lowest tier includes households with gross income between \$0 and \$2,499; the next tier includes households with gross income between \$2,500 and \$4,999; and so on). The maximum tier would go up to Salt Lake County's area median income. Each tier has a corresponding flat rent amount that is based on the lowest income in each band. Minimum rent will be set based on HASLC's current policy.

Please see attached tiered rent policy table that shows the income bands.

The rent will be based on tiers of household income. Please see attached for the table on the tiered rent policy table that shows the income bands.

This activity uses adjusted annual income as defined in 24 CFR 5.611 (as required for non-MTW PHAs)

This activity uses different definition of income because we are using the following MTW waivers:

1.n. - Utility Reimbursements (HCV)

HASLC plans to eliminate utility reimbursements to reduce costs while achieving greater cost effectiveness in federal expenditures and encouraging resident self-sufficiency. This waiver would result in cost savings and a reduced administrative burden. It would also help ensure that clients are contributing towards their rental payment or, at minimum, not receiving a payment for receiving housing assistance. This policy will apply to HCV households. The policy is not applicable to PH units as HASLC pay utilities at our PH sites.

In 2021, HASLC made 2,910 utility reimbursement payments to households in the HCV program. The average payment was \$52, though payments ranged from \$1 to \$240. A total of \$156,733 was paid out in 2021.

Impacted clients will be provided with 90 days notice of this policy change. If a household's income falls to an amount where they would have a negative rent (or be eligible for a utility reimbursement payment) then the rent would follow HASLC's current minimum rent policy.

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

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.

New activity

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Salt Lake City MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

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

HASLC plans to eliminate the Third-Party Requirement for Rent Reasonableness to reduce costs and achieve greater cost-effectiveness in federal expenditures. HASLC currently incurs costs and additional staff time when a third party determines rent reasonableness for HASLC owned, controlled, or managed properties. HASLC would determine rent reasonableness for units that HASLC owns, manages, or controls under this waiver.

HASLC will follow our current quality assurance method to ensure impartiality. HASLC will follow our current methodology to determine that rents charged are reasonable when compared to similar unassisted units in the market area.

At HUD's request, HASLC may be required to obtain services of a third-party entity to determine rent reasonableness for HASLC-owned units.

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 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 to all family types

This MTW activity applies to the following housing choice voucher unit types: This activity applies to units that HASLC owns, manages, or controls.

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.

New activity

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Salt Lake City MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

Following will explain quality assurance method:

Rent reasonableness determinations will be performed by HASLC staff trained in rent reasonableness regulations. To ensure consistency and uniformity, as part of the QA process, the supervisory staff will select random sample of completed rent reasonables and make sure they were done in accordance with the policies described in the Administrative Plan and consistent with SEMAP QC protocol. This process will be performed on all units with project-based or tenant-based vouchers including units owned, controlled, or managed by HASLC. **and attached for quality assurance method**

Following will explain rent reasonableness determination method:

HASLC will follow its current process for determining rent reasonableness. HASLC uses AffordableHousing.com to generate rent comparables. HASLC uses the website to generate a minimum of 3 unassisted rent comparables for each selected unit. Characteristics such as location, quality, unit size, unit type, age of unit, utilities provided, and amenities are used to ensure comparability and determine if the rent is reasonable. If the unit does not meet the rent reasonableness standard using this process, HASLC attempts to negotiate the rent with the owner. If a new, approvable rent is negotiated, the tenancy will be approved. If the owner is not willing to negotiate an approvable rent, the family must continue to search for eligible housing within the timeframe of the issued voucher. **and attached for rent reasonableness determination method**

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

HASLC plans to utilize MTW flexibility to reduce the frequency of reexaminations for most PH and HCV clients. This activity will help reduce costs, achieve greater cost effectiveness in federal expenditures, and encourage self-sufficiency (though this is less of a focus for PH, as most households are on a fixed income). Impacted HASLC households will have a consistent rent portion over a longer period, be able to keep more of their income between reexaminations if their income goes up and have an increased opportunity to build savings. It will also reduce the administrative burden on HASLC staff, free up staff capacity to focus on other priorities that advance our mission, and simplify the process for clients.

HASLC will follow a tiered reexamination schedule as follows:

- Households reporting zero income: annual
- Work-able households: biennial
- Fixed-income households (100% fixed income): triennial

In most cases, households will not be required to report any interim changes in income between reexaminations. These groups, however, must continue to report any income increases within 10 business days and may have a corresponding increase to their tenant portion:

- Zero-income households
- FSS Program households
- Homeownership Program households

Interim recertifications will be available at the request of the household. If the interim request is for a decrease in income, the rent will only be reduced if the decreased income moves the client to a lower income tier. Required interim recertifications for household composition changes will follow current HASLC policies and procedures.

This MTW activity serves the following statutory objectives:

Cost effectiveness;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 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.

New activity

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

Attached Hardship policy applies to:

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, Salt Lake City 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:

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

Recertification Schedule is

Other

HASLC will follow a tiered reexamination schedule as follows:

-Households reporting zero income: annual

-Work-able households: biennial

-Fixed-income households (100% fixed income): triennial

Household may request 2 or more interim recertifications per year.

Required interim recertifications for household composition changes or landlord rent increases will follow current HASLC policies and procedures.

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

HASLC plans to utilize MTW flexibility to reduce the frequency of reexaminations for most PH and HCV clients. This activity will help reduce costs, achieve greater cost effectiveness in federal expenditures, and encourage self-sufficiency. Impacted HASLC households will have a consistent rent portion over a longer period, be able to keep more of their income between reexaminations if their income goes up and have an increased opportunity to build savings. It will also reduce the administrative burden on HASLC staff, free up staff capacity to focus on other priorities that advance our mission, and

simplify the process for clients.

HASLC will follow a tiered reexamination schedule as follows:

- Households reporting zero income: annual
- Work-able households: biennial
- Fixed-income households (100% fixed income): triennial

At reexamination, each household will have an income reexamination and be placed in the income tier that matches their anticipated adjusted annual income. In most cases, households will not be required to report any interim changes in income between reexaminations. These groups, however, must continue to report any income increases within 10 business days and may have a corresponding increase to their tenant portion:

- Zero-income households
- FSS Program households
- Homeownership Program households

Interim recertifications will be available at the request of the household. If the interim request is for a decrease in income, the rent will only be reduced if the decreased income moves the client to a lower income tier. Required interim recertifications for household composition changes or landlord rent increases will follow current HASLC policies and procedures.

This MTW activity serves the following statutory objectives:

Cost effectiveness;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 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.

New activity

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, Salt Lake City 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.

Recertification Schedule is

Other

HASLC will follow a tiered reexamination schedule as follows:

-Households reporting zero income: annual

-Work-able households: biennial

-Fixed-income households (100% fixed income): triennial

Household may request 2 or more interim recertifications per year.

Required interim recertifications for household composition changes or landlord rent increases will follow current HASLC policies and procedures.

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

Under this waiver, HASLC will allow clients to self-certify assets up to \$50,000 at reexamination. This waiver will improve cost effectiveness in federal expenditures and reduce the administrative burden of verifying assets while still maintaining the integrity of the rent calculation process. Verification of assets is time consuming for both clients and staff. Allowing self-certification will simplify the process for clients and free up staff capacity to focus on other priorities that advance the organization's mission.

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

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.

New activity

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Salt Lake City 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)

Under this waiver, HASLC will allow clients to self-certify assets up to \$50,000 at reexamination. This waiver will improve cost effectiveness in federal expenditures and reduce the administrative burden of verifying assets while still maintaining the integrity of the rent calculation process. Verification of assets is time consuming for both clients and staff. Allowing self-certification will simplify the process for clients and free up staff capacity to focus on other priorities that advance the organization's mission.

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

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.

New activity

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Salt Lake City 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.a. - Vacancy Loss (HCV-Tenant-based Assistance)

HASLC will offer vacancy loss payments to participating landlords who agree to lease their units to HCV clients. The vacancy loss payments will offer compensation when landlords keep units available during the lease-up/inspection process.

This waiver will only apply when an HCV client leaves a unit, and the next tenant is also an HCV client. HASLC will also utilize cohort-specific waiver 4.2 allowing vacancy payments to be paid where the previous tenant was not an HCV client to incentivize new landlords to participate.

Implementing this waiver will incentivize landlords to continue their participation in the HCV program and maintain the availability of units in Salt Lake County's very tight rental market. The vacancy loss payments are part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing choice in our area.

Landlords can receive a vacancy loss payment up to 100% of the contract rent for renting their unit to an HCV voucher holder. The amount paid will be a daily proration of the full agreed upon contract rent from the day HASLC receives the "request for tenancy approval" to the start date of the HAP contract, but in no case will it exceed 100% of the contract rent.

Payment will be made directly to the landlord when the next HAP contract is executed along with the signed lease.

HASLC will update our Administrative Plan to reflect the vacancy loss policy.

This MTW activity serves the following statutory objectives:

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

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.

New activity

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Salt Lake City 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

\$Landlords can receive a vacancy loss payment up to 100% of the contract rent for renting their unit to an HCV voucher holder. The amount paid will be a daily proration of the full agreed upon contract rent from the day HASLC receives the "request for tenancy approval" to the start date of the HAP contract, but in no case will it exceed 100% of the 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.b. - Damage Claims (HCV-Tenant-based Assistance)

As a further incentive for a landlord's continued participation in the program, HASLC will add a damage claim policy for landlords who rent to HCV clients. The Damage Claim policy is part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing choice in our area.

To qualify, the damage must be beyond normal wear and tear and must have occurred after the damage claim policy goes into effect. Landlords may submit and HASLC may approve damage claims for the lesser of the cost of repairs or up to two months of contract rent (minus any amounts paid in security deposit).

The landlord does not need to obtain a judgement in order to qualify for reimbursement. They will, however, need to submit all paperwork required under HASLC's damage claim policy.

Property damage will be the only eligible type of claim. Unpaid rent/utilities and court costs are not eligible for reimbursement.

HASLC will make payment to the landlord only once another HAP contract is executed between the owner and HASLC.

HASLC will update the Administrative Plan to reflect HASLC's Damage Claim policy.

This MTW activity serves the following statutory objectives:

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

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.

New activity

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Salt Lake City 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

\$Landlords may submit and HASLC may approve damage claims for the lesser of the cost of repairs or up to two months of contract rent (minus any amounts paid in security deposit)..

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)

HASLC will offer new landlords who rent to HCV clients an extra non-refundable security deposit as an additional incentive to participate in the HCV program and increase housing choice in Salt Lake County.

If a landlord has not received a HAP payment in the past 12 months, they qualify as “new” for this incentive.

The non-refundable security deposit will be the lesser of one month of contract rent or \$500. New landlords can earn the incentive for up to five (5) units within 12 months of an initial lease.

The non-refundable security deposit will be paid directly to the landlord when the HAP contract is executed.

This MTW activity serves the following statutory objectives:

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

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.

New activity

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Salt Lake City 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

\$The non-refundable security deposit will be the lesser of one month of contract rent or \$500. New landlords can earn the incentive for up to five (5) units within 12 months of an initial lease..

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.

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

HASLC plans to offer pre-qualifying inspections to expedite the lease up process and minimize delays or losses due to inspections. Pre-qualifying unit inspections are part of a larger landlord incentives initiative to increase the supply of

affordable housing, maintain quality landlords and units, and increase housing choice in our area.

HASLC will follow the HQS inspection process pursuant to 24 CFR 982.401 that it uses for all properties. Passed pre-qualifying inspections will be valid for 90 days from the passed inspection date.

Clients may request an interim inspection after move-in as needed; HASLC will not place limits on the number of interim inspections allowed.

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.

New activity

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Salt Lake City MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

The pre-inspection is valid for

90 days.

5.c. - Third-Party Requirement (HCV)

HASLC incurs costs and additional staff time when a third party completes inspections for HASLC owned, controlled, or managed properties. HASLC plans to eliminate the third-party requirement for inspections to reduce costs and achieve greater cost-effectiveness in federal expenditures, improve administrative efficiencies, eliminate confusion for clients, and improve the response time for conducting inspections.

HASLC would complete all inspections for units that HASLC owns, manages, or controls under this waiver.

At HUD's request, HASLC may be required to obtain services of a third-party entity to complete inspections for HASLC owned, controlled, or managed units.

HASLC will follow the HQS inspection process pursuant to 24 CFR 982.401 that it uses for all other properties. HASLC will continue to follow its quality assurance method to ensure an objective analysis.

Clients may request an interim inspection after move-in as needed; HASLC will not place limits on the number of interim inspections allowed.

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

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.

New activity

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Salt Lake City MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

The quality assurance method:

Following will explain the quality assurance method – Senior staff will ensure inspections were done in accordance with the policies described in the Administrative Plan and consistent with SEMAP QC protocol. In addition, HALSC inspectors quality check each others work to ensure consistency.

If [Upload file] options- Display 'Attached for quality assurance method'

5.d. - Alternative Inspection Schedule (HCV)

HASLC will utilize MTW flexibility to change inspections from a biennial to triennial schedule for all HCV units in accordance with HQS inspection standards as outlined in 24 CFR 982.401. This change will reduce administrative burdens and related costs, leading to greater cost-effectiveness in federal expenditures.

Properties must have two consecutive passed inspections to qualify for triennial inspections. Any property that fails an initial or triennial inspection will be held to an annual inspection schedule until such time that the unit passes two consecutive inspections.

Clients may request an interim inspection after move-in as needed; HASLC will not place limits on the number of interim inspections allowed.

HUD may require that HASLC perform an inspection at any time for health and safety, as well as accessibility purposes.

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

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.

New activity

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Salt Lake City 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)

HASLC plans to raise its PBV Program Cap with the objective of increasing housing choice in Salt Lake County by providing additional units for low-income households. Project basing more units will also free up costs because HASLC sets rents at units it owns at lower than market. Additionally, this activity makes future projects more competitive and increases our housing inventory and partnership possibilities, creating additional revenue and expanding our affordable housing portfolio. Under this waiver, HASLC may approve up to 40% of units authorized in the Annual Contributions Contract to be project based.

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

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.

New activity

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Salt Lake City MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

40.00% of total authorized HCV units will be authorized for project-basing.

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

HASLC plans to raise its PBV Project Cap with the objective of increasing housing choice in Salt Lake County by providing additional units for low-income households. Project basing more units will also free up costs because HASLC sets rents at units it owns at lower than market. Additionally, this activity makes future projects more competitive and increases our housing inventory and partnership possibilities, creating additional revenue and expanding our affordable housing portfolio. HASLC plans to increase the cap on vouchers that can be project-based within a project to 100%.

HASLC will continue to be subject to Notice PIH 2013-27 or any successor notices.

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

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.

New activity

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Salt Lake City 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)

HASLC plans to use MTW flexibility to eliminate the selection process in the award of PBVs to properties owned by HASLC that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site. This activity will help meet the MTW statutory objectives of reducing costs while achieving greater cost effectiveness in federal expenditures and increasing housing choice.

HASLC will conduct a layering review before implementing this waiver.

HASLC will complete site specific requirements.

All HQS inspections will be performed by an independent entity according to 24 CFR983.59(b) or 24 CFR983.103(f).

HASLC is subject to Notice PIH 2013-27 or its successor(s).

All impacted property must be owned by a single-asset entity per Notice PIH 2017-21.

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

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.

New activity

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Salt Lake City MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

9.e. - Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)

HASLC would like to have the option to allocate project-based vouchers to shared housing and manufactured housing. This change will allow HASLC to offer more housing choice in Salt Lake County and increase the availability of affordable units.

All units must still comply with HQS standards. HASLC will follow all current inspection policies and procedures for these units.

All units will comply with deconcentration and desegregation requirements under 24 CFR part 903.

HASLC will complete a subsidy layering review before allocating a PBV to shared or manufactured housing.

Shared housing units may not be owner occupied.

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.

New activity

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Salt Lake City MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

The MTW agency anticipates 0 number of shared housing units in the fiscal year.

The MTW agency assisted 0 number of shared housing units in the most recently completed PHA fiscal year.

The MTW agency anticipates 0 number of manufactured housing units in the fiscal year.

The MTW agency assisted 0 number of manufactured housing units in the most recently completed PHA fiscal year.

17.c. - Housing Development Programs

HASLC plans to implement this activity so additional funds for affordable housing development could be utilized and, as a result, increase housing choice in Salt Lake County. Under this activity, HASLC may utilize funding to acquire, rehabilitate, and/or build affordable housing units that are not public housing for low-income families including housing that meets HUD requirements for MTW "local, non-traditional housing" as defined in HUD PIH Notice 2011-45 or successor notices.

HASLC could use this activity to provide gap financing to affordable housing developments including, but not limited to: PBV developments, Low Income Housing Tax Credit developments and/or eligible developments activities, subject to approval by the HASLC Board of Commissioners.

HASLC may expend MTW funds including Public Housing Operating or Capital Funds, Housing Assistance Payments, and/or HCV Administrative Fee reserves on such activities provided that HASLC will not expend more than 10% of its HAP budget on local, non-traditional activities.

HASLC will ensure that:

-Families receiving housing or services through local, non-traditional activities meet the definition of low income.

-All projects that use this MTW flexibility comply with section 30 of the 1937 Housing Act.

-Any MTW Funding awarded to a third-party provider is competitively bid

This MTW activity serves the following statutory objectives:

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

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.

New activity

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Salt Lake City 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
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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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D.	Safe Harbor Waivers.
D.1	Safe Harbor Waivers seeking HUD Approval: No Safe Harbor Waivers are being requested.

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, Agency-Specific Waivers may be requested.</p> <p>Please see attached for Agency-Specific Waiver(s) requested this year.</p>
E.2	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>MTW Agency does not have approved Agency-Specific Waivers</p>

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2021	\$778,961	\$778,961	\$0	2022-09-30

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

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

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

G.3	Substantially the Same (STS) – Local, Non-Traditional.	
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	# 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?
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G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.	

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

H.	Public Comment
Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.	

I.	Evaluations.
No known evaluations.	

Tier	Income Minimum	Income Maximum	Rent (based off 30% of minimum income in tier)
1	0	2499	\$50 minimum rent
2	2500	4999	63
3	5000	7499	125
4	7500	9999	188
5	10000	12499	250
6	12500	14999	313
7	15000	17499	375
8	17500	19999	438
9	20000	22499	500
10	22500	24999	563
11	25000	27499	625
12	27500	29999	688
13	30000	32499	750
14	32500	34999	813
15	35000	37499	875
16	37500	39999	938
17	40000	42499	1000
18	42500	44999	1063
19	45000	47499	1125
20	47500	49999	1188
21	50000	52499	1250
22	52500	54999	1313
23	55000	57499	1375
24	57500	59999	1438
25	60000	62499	1500
26	62500	64999	1563
27	65000	67499	1625
28	67500	69999	1688
29	70000	72499	1750
30	72500	74999	1813
31	75000	77499	1875
32	77500	79999	1938
33	80000	82499	2000
34	82500	84999	2063
35	85000	87499	2125
36	87500	89999	2188
37	90000	92499	2250
38	92500	94999	2313

Cohort-Specific Waivers

4.1 Waiver of Mandatory Initial Inspection

Under this waiver, HASLC may eliminate the requirement for an initial inspection under certain circumstances. This waiver will only apply to the initial inspection. All impacted units must still have regular inspections per HASLC policies. HQS inspection standards found at 24 CFR 982.401 may not be altered for any required inspections.

This waiver is part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing choice in our area. It will also help reduce administrative burdens and related costs.

HASLC may waive the initial inspection only if the unit:

- Is less than five years old (as demonstrated by a certificate of occupancy provided by the landlord), OR
- Passed an HQS inspection within the previous three years, OR
- Located in a census tract with a poverty rate less than 10%

Clients may request an interim inspection after move-in as needed; HASLC will not place limits on the number of interim inspections allowed.

4.2 Front-End Vacancy Loss Payments

Under MTW waiver 4a, HASLC will offer vacancy loss payments to participating landlords with a vacating HCV tenant who then agree to lease their unit to another HCV client. The vacancy loss payments will offer compensation when landlords keep units available during the lease-up/inspection process.

This cohort-specific waiver will allow HASLC to also offer these payments when the previous tenant was not an HCV client.

Implementing this waiver will incentivize new landlords to start participation in the HCV program and encourage existing landlords to make new units available in Salt Lake County's very tight rental market. The front-end vacancy loss payments are part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing choice in our area.

Landlords can receive a vacancy loss payment up to 100% of the contract rent for renting their unit to an HCV voucher holder even if the previous tenant was not an HCV tenant. The amount paid will be a daily proration of the full agreed upon contract rent from the day the HASLC receives the "request for tenancy approval" to the start date of the HAP contract, but in no case will it exceed 100% of the contract rent.

Payment will be made directly to the landlord when the HAP contract is executed along with the signed lease.

HASLC will update our Administrative Plan to reflect the vacancy loss policy.

PUBLIC COMMENTS

RAB meeting on August 2, 2022

RAB member asked which slides from the presentation pertain to those in attendance. Housing Authority of Salt Lake City (HASLC) staff summarized which parts of the MTW Supplement would directly impact Public Housing residents.

RAB member asked if Public Housing residents will be made to go back to work. HASLC staff clarified that the Moving to Work program itself is not synonymous with work requirements. HASLC staff then explained that while work requirements are an allowable activity under MTW, that HASLC has not included them in the FY2022 or FY2023 plan. HASLC added that any potential future work requirements would not be intended to apply to disabled or senior residents.

Public Hearing on September 23, 2022

No comments were received at the September 23, 2022 public hearing.

Agency Analysis of Comments Received

The Housing Authority of Salt Lake City (HASLC) received a number of clarifying questions from the RAB that were answered directly and did not require additional follow-up (see Public Comments document). No other comments were received for the FY2023 MTW Supplement. However, the content is the same as the FY2022 MTW Supplement and all comments received during that public process were considered.

Alternative Reexamination Schedule Impact Analysis

1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution):

We anticipate that HAP expenses will see an annual increase comparable to past years, largely due to increased payment standards. On average, monthly HAP increased \$49 from June 2021 to June 2022. PHA Budget Authority is increased annually to keep the budget in line with these inflationary related anticipated increases. If household portions increase due to increased earnings, HASLC will add additional households resulting in similar annual HAP expenditures.

Reexaminations average 4.5 hours of staff time per household to complete. Conducting alternative reexaminations will alleviate administrative time and costs directly related to the recertification process allowing for greater efficiency and more staff to be available for other activities that benefit the community. HASLC currently performs 2,643 recertifications for households that hold vouchers impacted by MTW policy. This will be reduced to approximately 1,285 annual recertifications resulting in an administrative cost savings of \$169,000. This does not consider interim requests, as the number of interim requests is unknown currently.

Overall, HASLC does not expect to see an increase in per family contribution, with this being the first year of implementation. Enrollment activities and hardship requests will reduce these savings, but the exact impact of these activities is unknown at this time.

It is also possible that clients will increase their income between reexaminations, resulting in higher per family contributions by HASLC than would have been spent under the current rent policy due to not capturing savings from income increases. These activities will provide a new source of data for HASLC, HUD, and other PHAs on the costs and benefits of alternative reexaminations.

2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs):

The average monthly TTP increases by \$25 at each reexamination and is typically based on increases in household income. The phasing in of alternative reexaminations will delay the TTP increase for the initial year and with each subsequent year the TTP is expected to increase at a slightly higher level as households with earned incomes are recertified. Elderly or disabled households with fixed income will experience less of an increase to TTP. Clients may also utilize the benefit of biennial/triennial income reexaminations and increase their earnings, thereby decreasing the percentage of their income paid towards housing costs.

3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist): Alternative reexaminations are expected to slightly extend time on our agency's waitlist due to the first two years of implementation, but alternatively, we expect a decrease in time on our waitlist in the long term. Historically, we have determined there are 10 to 12

households a year that exit the program due to income limitations. Conversion to an alternative reexamination schedule will not identify these over income households as frequently, due to the removal of reporting requirements between reexaminations. As we implement by phasing households in over the first two years, we expect to see 5 to 6 fewer households exit the program in the first and second years. We currently have an average monthly attrition rate of 19 households a month for other causes (program violations, death, voluntary withdrawal), so the time related to this would be less than two weeks longer for households on the waiting list. In the long term, we are expecting an increased attrition rate due to over-income families, as family rent portions increase due to incentivized income increases, we will be able to pull an increased number of households from the waiting list annually.

- 4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency):** Minimal to no expected impact. Households on a biennial/triennial reexamination cycle may receive fewer termination notices for noncompliance with required appointments and/or documentation.
- 5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program:** We do not anticipate any impact from the implementation of an alternative reexamination schedule on our agency's Public Housing occupancy level or the utilization rate in our HCV program. Our public housing program has official designation for seniors and disabled persons, which are typically on fixed income. We anticipate the implementation of this activity will decrease the administrative burden on staff and simplify the process for clients.
- 6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice:** An alternative reexamination schedule will help HASLC meet the MTW statutory goals of achieving greater cost effectiveness in federal expenditures and encouraging self-sufficiency. Less frequent reexaminations will reduce administrative burdens and related costs while increasing staff capacity to focus on other priorities that advance MTW goals and HASLC's mission. Impacted HASLC clients will have a consistent rent portion over a longer period and be able to keep more of their income between reexaminations if their income goes up. Any increased income could be used to build savings, pay down debt, repair credit, or meet other financial goals on a pathway to self-sufficiency.
- 7. Impact on the agency's ability to meet the MTW statutory requirements**
Ensure 75% of HHs are very low income: During the first two years of implementation of alternative reexaminations it would be unknown where clients' income has increased. However, as an agency approximately 70% of the population we serve are senior and or disabled. This population live primarily on fixed income, often from benefits and entitlements. 85% of our non-elderly, nondisabled households fall into the very low-income range. This large percentage of our demographic will help ensure we meet the statutory objective of 75% of households who are very low income even as we introduce some activities that encourage income increases.

At recertification, clients are incentivized to again increase income while the subsidy needs have reduced. This reduces the agency's HAP expenditure resulting in the ability to assist more clients at lower income levels, further affording us the ability to meet this objective.

Establish a reasonable rent policy that encourages employment and self-sufficiency: The combination of a tiered rent policy with alternative reexamination schedule will encourage

employment and self-sufficiency within work-able households. Clients are incentivized to increase their household income by removing the requirement to report increases to income on an interim basis. This will allow households to maintain rent levels for extended periods of time between recertifications, while tiered rents will encourage incremental income growth between rent brackets. Policies associated with these activities will encourage employment and self-sufficiency.

Ability to assist substantially the same number of households: The alternative reexamination schedule incentivizes clients to increase household income as this would not impact their rental portion as income increases until the next reexamination. As adjustments are made during the reexamination process, we can assist more families because of the reduced HASLC portion of payment. This allows us to continue to assist substantially the same number of eligible low-income households.

Other statutory objectives such as Comparable Mix Requirements and HQS would not be impacted by this activity.

8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity:

This is an administrative efficiency that should not require assisted families to request a hardship exemption. Clients may request an interim any time household income decreases, limiting the number of hardship requests.

9. Across all factors above, the impact on protected classes (and any associated disparate impact): The impact will be minimal. Decreased recertifications allow for pathways to self-sufficiency across the spectrum of clients HASLC assists. While there is a risk of less contact with HASLC we are confident there are greater opportunities in housing choice. New options for this improved housing choice are through meeting with the Landlord Outreach specialist, continued marketing under the AFFH objective, and consistently promoting the ability to move to high opportunity zones.

HASLC MTW Hardship Policy

HASLC has created a hardship policy for when a requirement or provision of certain MTW activities constitutes a financial or other hardship for an HASLC household. HASLC will review its hardship policy with clients during the intake and recertification processes. The agency will also consider if a client qualifies for a hardship exemption at the time of a potential termination of assistance that is due to an MTW activity. When a client requests a hardship exemption from an MTW activity included in this policy, HASLC will suspend the activity for the household beginning the next month after the request until HASLC has determined if the request is warranted. Hardship information will be retained by HASLC for the duration of HASLC's participation in the MTW demonstration program.

Hardship Policy Covering Alternative Recertification Schedule

To qualify for a hardship exemption, a family must submit a request for a hardship exemption in writing. The request must explain the nature of the hardship.

Approval will be for the following reasons ONLY:

- Decrease in income because of changed circumstances including loss or reduction of employment, death in the family, or reduction in or loss of earning or other assistance
- Increase in expenses for qualified households including out-of-pocket medical expenses, unreimbursed childcare expenses, disability related expenses, educational expenses, or other comparable items

The decrease in income or increase in expenses would have to result in the client changing income tiers for a reduction in the tenant rent portion to be processed.

HASLC will determine whether an approved hardship exists within 30 days after the request is received.

- If the request does not meet HASLC hardship standards outlined above, HASLC will resume the MTW activity and collect any retroactive rent, if applicable, through a reasonable repayment agreement.
- If the request does meet the hardship standards outlined above, the agency will continue to provide an exemption from the MTW activity for 12 months or until the next biennial/triennial reexamination.

If a client requests an additional hardship following the expiration of a previous hardship (or for a hardship renewal), the request will be treated as a new hardship request and undergo a new determination based on current income and information.

If a client disagrees with a hardship determination, they will follow HASLC's informal hearing process outlined in the Administrative Plan and ACOP.