

PHA Name : Salt Lake City

PHA Code : UT004

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

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) utilizes Moving to Work (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 has already implemented a number of MTW activities and plans to launch more in our second full calendar year as an MTW agency. 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 has implemented 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 at HASLC-owned properties.

Increasing Self-Sufficiency

HASLC has helped encourage self-sufficiency in the near term by eliminating utility reimbursements. We also plan to implement a tiered rent policy (currently pending software readiness) 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 enhance our Family Self-Sufficiency program.

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. To further support landlords and increase housing choice, HASLC has implemented a variety of activities that will help strengthen existing landlord relationships and build new relationships with landlords who could benefit from participation in the HCV program. Our expanded program leverages MTW flexibilities to streamline processes and provides financial incentives to help alleviate common concerns landlords have when renting to HCV clients. These activities include offering waived initial inspections in limited situations, pre-qualifying unit inspections, vacancy loss payments, reimbursement for property damage claims, and an additional incentive for new landlords. In the 2024 Plan Year, we are also requesting approval for a landlord referral bonus that would be paid to existing landlords who refer new landlords to our HCV program.

HASLC has also leveraged MTW flexibility to increase housing choice by expanding our Project-Based Voucher (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 (currently pending software readiness), and utilizing funding to acquire, rehabilitate, and/or build affordable housing units that are not public housing. In addition, HASLC has utilized MTW flexibility to eliminate the PBV selection process for HASLC-owned units, including units owned by HASLC instrumentalities.

We are excited for our second full year 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) | Currently Implementing |
| 2. Payment Standards and Rent Reasonableness | |
| b. Payment Standards- Fair Market Rents (HCV) | Plan to Implement in the Submission Year |
| d. Rent Reasonableness – Third-Party Requirement (HCV) | Currently Implementing |
| 3. Reexaminations | |
| a. Alternative Reexamination Schedule for Households (PH) | Currently Implementing |
| b. Alternative Reexamination Schedule for Households (HCV) | Currently Implementing |
| c. Self-Certification of Assets (PH) | Currently Implementing |
| d. Self-Certification of Assets (HCV) | Currently Implementing |
| 4. Landlord Leasing Incentives | |
| a. Vacancy Loss (HCV-Tenant-based Assistance) | Currently Implementing |
| b. Damage Claims (HCV-Tenant-based Assistance) | Currently Implementing |
| c. Other Landlord Incentives (HCV- Tenant-based Assistance) | Currently Implementing |
| 5. Housing Quality Standards (HQS) | |
| a. Pre-Qualifying Unit Inspections (HCV) | Currently Implementing |
| c. Third-Party Requirement (HCV) | Currently Implementing |
| d. Alternative Inspection Schedule (HCV) | Currently Implementing |
| 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) | Currently Implementing |
| b. Increase PBV Project Cap (HCV) | Currently Implementing |
| c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV) | Currently Implementing |
| 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 | Currently Implementing |

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

| |
|--|
| 1.b. - Tiered Rent (HCV) |
| Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative |
| HASLC plans to implement a tiered rent policy to simplify the rent calculation process and reduce administrative burdens as soon as our software system is updated to allow for this activity. HASLC staff will spend less time calculating rent and completing the reexamination process with biennial or triennial recertifications for most voucher holders. Combined, these activities will also encourage self-sufficiency because participants will be able to keep more of their income between reexaminations if their income goes up. |

Since most of HASLC's Public Housing residents 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.

Households will be assigned a tier based on anticipated 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. 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 reexamination, 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, once tiered rent is launched only income decreases that lower the tier will result in a rent reduction for households impacted by the tiered rent policy.

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

Cost effectiveness; Self-sufficiency

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

Increased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

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

This activity applies to all HCV voucher holders except elderly, disabled, and special purpose voucher holders.

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

This activity applies to all HCV units except elderly, disabled, and special purpose voucher units.

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

This activity is approved but has not yet been implemented (pending software readiness).

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

No

Please describe how the income bands are structured.

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 upload the tiered rent policy table that shows the income bands.

This document is attached.

What is the income basis for assigning households to income bands?

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

1.n. - Utility Reimbursements (HCV)

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

HASLC has eliminated utility reimbursements (URPs) to reduce costs while achieving greater cost effectiveness in federal expenditures and encouraging participant self-sufficiency. This waiver has resulted in cost savings and a reduced administrative burden. It also helps ensure that clients are contributing towards their rental payment or, at minimum, not receiving a payment from HASLC while receiving housing assistance.

If a household's income falls to an amount where they would have a negative rent (or previously be eligible for a utility reimbursement payment) then the rent will follow HASLC's current minimum rent policy.

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

Cost effectiveness; Self-sufficiency

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

In 2022, HASLC paid a total of \$123,622 in utility reimbursement payments . Impacted households were provided with a

120-day notice before the waiver was implemented in May 2023.

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

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

HASLC plans to utilize MTW flexibility to increase payment standards up to 150% FMR as needed to meet community, agency, and household needs. HASLC would raise payment standards to up to 150% FMR at select projects that house special populations where additional services are provided (the additional services would be paid through the higher FMR). HASLC anticipates that only 2% of all units will be impacted by the proposed increase in payment standards.

HASLC has included an impact analysis and hardship policy in our submission and will implement them once the waiver is approved by HUD.

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

Housing choice

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

Increased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

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

The waiver will be implemented as needed at select projects that house special populations where additional services are provided.

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

The waiver will be implemented as needed at select projects that house special populations where additional services are provided.

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 |
| <p>Does this MTW activity require a hardship policy?</p> <p>Yes</p> <p>This document is attached.</p> |
| <p>Does the hardship policy apply to more than this MTW activity?</p> <p>Yes</p> |
| <p>Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</p> <p>3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)</p> |
| <p>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</p> <p>No</p> |
| <p>How many hardship requests have been received associated with this activity in the past year?</p> <p>No hardship were requested in the most recent fiscal year.</p> |
| <p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>Yes</p> |
| <p>What is the status of the Safe Harbor Waiver request?</p> <p>The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).</p> |
| <p>Does the MTW activity require an impact analysis?</p> <p>Yes</p> <p>This document is attached.</p> |
| <p>Does the impact analysis apply to more than this MTW activity?</p> <p>No</p> |
| <p>Please explain the payment standards by FMR:</p> <p>HASLC would raise payment standards to up to 150% FMR at select projects that house special populations where additional services are provided. HASLC anticipates that only 2% of all units will be impacted by the proposed increase in payment standards.</p> |

| |
|---|
| <p>2.d. - Rent Reasonableness – Third-Party Requirement (HCV)</p> |
| <p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>HASLC has eliminated the Third-Party Requirement for Rent Reasonableness to reduce administrative burdens and achieve greater cost-effectiveness in federal expenditures. HASLC previously incurred costs and additional staff time when a third party determined rent reasonableness for HASLC owned, controlled, or managed properties. HASLC now determines rent reasonableness for units that HASLC owns, manages, or controls (including instrumentalities of HASLC) under this waiver.</p> |

HASLC follows our regular quality assurance method to ensure impartiality. HASLC follows our regular 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.

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

Cost effectiveness

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

Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

This voucher applies only to units that are owned, managed, or controlled by HASLC (including instrumentalities of HASLC).

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.

HASLC has implemented this activity, and has seen a corresponding reduction in administrative burden.

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

No

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

Rent reasonableness determinations are performed by HASLC staff trained in rent reasonableness regulations. To ensure consistency and uniformity, as part of the QA process, the supervisory staff selects a random sample of completed rent reasonable determinations and makes sure they were done in accordance with the policies described in the Administrative Plan and consistent with SEMAP QC protocol. This process is performed on all units with project-based or tenant-based vouchers including units owned, controlled, or managed by HASLC or its instrumentalities under this waiver.

No document is attached.

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

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.

No document is attached.

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

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

HASLC has utilized MTW flexibility to reduce the frequency of reexaminations for most PH residents. This activity helps 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 with income: 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 for any reason.

HASLC is requesting to waive the HOTMA regulation that an interim recertification is required if unearned income increases by 10% or more. The HOTMA regulation conflicts with our approved MTW activity and would result in added administrative burden, essentially removing the time savings of the activity because HASLC would again have to closely monitor income changes.

Required interim recertifications for household composition changes will follow current HASLC policies and procedures.

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

Cost effectiveness; Self-sufficiency

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about

what has been accomplished or changed during the implementation.

This activity launched in 2023 and we expect to see impacts in the coming year.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Provided Already

What is the recertification schedule?

Other

HASLC will follow a tiered reexamination schedule as follows:

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

How many interim recertifications per year may a household request?

2 or more

Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.

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

Changes in family composition must continue to be reported to HASLC within 10 business days per existing HASLC policy.

Interim recertifications will be available at the request of the household for any reason.

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

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

HASLC utilizes MTW flexibility to reduce the frequency of reexaminations for most HCV clients. This activity helps 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 with income: biennial
- Fixed-income households (100% fixed income): triennial

At reexamination, each household will have an income reexamination and (if applicable, based on voucher type when the tiered rent policy is implemented) 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. Note: 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 (if applicable).

HASLC is requesting to waive the HOTMA regulation that an interim recertification is required if unearned income increases by 10% or more. The HOTMA regulation conflicts with our approved MTW activity and would result in added administrative burden, essentially removing the time savings of the activity because HASLC would again have to closely monitor income changes.

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

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

Cost effectiveness; Self-sufficiency

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

This activity launched in 2023 and we expect to see impacts in the coming year.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Provided Already

What is the recertification schedule?

Other

HASLC will follow a tiered reexamination schedule as follows:

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

How many interim recertifications per year may a household request?

2 or more

Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.

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

Changes in family composition must continue to be reported to HASLC within 10 business days per existing HASLC policy.

Interim recertifications will be available at the request of the household for any reason.

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

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

Under this waiver, HASLC allows PH residents to self-certify assets up to \$50,000 at reexamination. This waiver improves cost effectiveness in federal expenditures and reduces the administrative burden of verifying assets while still maintaining the integrity of the rent calculation process. Verification of assets is time consuming for both residents and staff. Self-certification simplifies the process for residents and frees up staff capacity to focus on other priorities that advance the organization's mission.

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

Cost effectiveness

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

Self-certification of assets up to \$50,000 at reexamination is now available for all Public Housing Residents, reducing

administrative burdens for staff and residents.

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

No

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

\$50,000.

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

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

Under this waiver, HASLC allows HCV participants to self-certify assets up to \$50,000 at reexamination. This waiver improves cost effectiveness in federal expenditures and reduces the administrative burden of verifying assets while still maintaining the integrity of the rent calculation process. Verification of assets is time consuming for both HCV participants and staff. Self-certification simplifies the process for HCV participants and frees up staff capacity to focus on other priorities that advance the organization's mission.

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

Cost effectiveness

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

Self-certification of assets up to \$50,000 at reexamination is now available for HCV participants, reducing HASLC's administrative burden.

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

No

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

\$50,000.

4.a. - Vacancy Loss (HCV-Tenant-based Assistance)

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

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

This waiver only applies when an HCV client leaves a unit, and the next tenant is also an HCV client. HASLC also utilizes 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.

This activity incentivizes 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 monthly contract rent for renting their unit to an HCV voucher holder. The amount paid will be a daily proration of the full agreed upon monthly 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 monthly contract rent. Vacancy Loss Payments are only available if funding allows.

Payment will be made directly to the landlord when the next HAP contract is executed along with the signed lease. HASLC has updated our Administrative Plan to reflect the vacancy loss policy.

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

Housing choice

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

Increased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

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

This activity applies to tenant-based vouchers only, and does not apply to landlords renting to special purpose voucher holders.

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

This activity applies to tenant-based vouchers only, and does not apply to landlords renting to special purpose voucher holders.

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

This activity is scheduled to launch in 2023. Vacancy Loss Payments will be available as funding allows.

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

No

Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?)

To all units

What is the maximum payment that can be made to a landlord under this policy?

Landlords can receive a vacancy loss payment up to 100% of the monthly contract rent for renting their unit to an HCV voucher holder. The amount paid will be a daily proration of the full agreed upon monthly 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 monthly contract rent. Vacancy Loss Payments are only available as funding allows.

How many payments were issued under this policy in the most recently completed PHA fiscal year?

0

What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?

\$0

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

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

As a further incentive for a landlord's continued participation in the program, HASLC has added 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 (after the security deposit has been applied). Damage Claim payments are only available as funding allows.

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 has updated the Administrative Plan to reflect HASLC's Damage Claim policy.

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

Housing choice

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

Increased expenditures

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

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

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

admissions and currently assisted households?

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

The activity is only available for tenant-based vouchers. Special purpose vouchers are not eligible for the activity.

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.

The activity is scheduled to launch in 2023. Damage Claims will be available as funding allows.

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

No

Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?)

To all units

What is the maximum payment that can be made to a landlord under this policy?

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 (after any security deposit is applied to the balance). Damage Claim payments are only available as funding allows.

How many payments were issued under this policy in the most recently completed PHA fiscal year?

0

What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?

\$0

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

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

New or Returning Landlord Incentive Payment: HASLC offers 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 for this incentive. The non-refundable security deposit is 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 is paid directly to the landlord when the HAP contract is executed. New or Returning Landlord Incentive payments are only available as funding allows.

Landlord Referral Bonus: In FY2024, HASLC would like to introduce a landlord referral bonus that will pay existing owners \$250 to refer a new landlord to the program if the referral signs a HAP contract. For the purpose of this incentive, a new landlord is defined as a landlord who has never received a HAP payment from HASLC. Referring landlords can earn the incentive for up to a total of four (4) times. The referral bonus will be paid directly to the referring landlord when the referred landlord's HAP contract is executed. Landlord Referral Bonus payments are only available as funding allows.

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

Housing choice

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

Increased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

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

The activity applies to tenant-based vouchers only. Special purpose vouchers are not eligible.

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

The activity applies to tenant-based vouchers only. Special purpose vouchers are not eligible.

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.

The New or Returning Landlord incentive is scheduled to launch in 2023, as funding allows. The Landlord Referral Bonus is a new activity.

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

No

Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?)

Certain types of units only

What is the maximum payment that can be made to a landlord under this policy?

The New or Returning Landlord Incentive is 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, for a maximum of \$2500. New or Returning Landlord Incentive payments are only available as funding allows.

The Landlord Referral Bonus will pay existing owners \$250 to refer a new landlord to the program if the referral signs a HAP contract. Referring landlords can earn the incentive for up to a total of four (4) times, for a maximum of \$1000.

Landlord Referral Bonus payments are only available as funding allows.

How many payments were issued under this policy in the most recently completed PHA fiscal year?

0

What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?

\$0

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

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

HASLC offers 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 follows 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.

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

Housing choice

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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.

Pre-qualifying unit inspections are now available to landlords who request them. To date, HASLC has received five requests for pre-qualifying unit inspections and expects more now that the activity has been widely announced.

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

No

How long is the pre-inspection valid for?

The pre-inspection is valid for 90 days.

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

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

HASLC incurs costs and additional staff time when a third party completes inspections for HASLC owned, controlled, or managed properties (including our instrumentalities). HASLC has eliminated 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 now completes inspections for units that HASLC owns, manages, or controls under this waiver (including our instrumentalities).

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 (including our instrumentalities).

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.

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

Cost effectiveness

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

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

This activity applies to households living in units owned, managed, or controlled by HASLC or its instrumentalities.

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

This activity applies to units owned, managed, or controlled by HASLC or its instrumentalities.

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.

The activity has been implemented, resulting in reduced administrative burden and increasing cost-effectiveness.

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

No

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

Following will explain the quality assurance method

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.

No document is attached.

5.d. - Alternative Inspection Schedule (HCV)

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

HASLC is using MTW flexibility to change inspections from a biennial to triennial schedule for HCV units in accordance with HQS inspection standards as outlined in 24 CFR 982.401. This change reduces 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 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.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

The activity was implemented in 2023, with impacts expected in the coming years.

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

No

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

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW

activity contributes to a larger initiative

HASLC has raised its PBV Program Cap with the objective of increasing housing choice in Salt Lake County by providing additional units for low-income households. 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.

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

Cost effectiveness; Housing choice

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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.

The activity was implemented and will be utilized as needed.

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

No

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

40.00%

9.b. - Increase PBV Project Cap (HCV)**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

HASLC raised its PBV Project Cap with the objective of increasing housing choice in Salt Lake County by providing additional units for low-income households. 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.

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

Cost effectiveness; Housing choice

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

Decreased expenditures

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

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about

what has been accomplished or changed during the implementation.

The activity was implemented and will be utilized as needed.

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

No

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

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

HASLC has used MTW flexibility to eliminate the selection process in the award of PBVs to properties owned by HASLC (including its instrumentalities) that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site. This activity helps 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.

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

Cost effectiveness; Housing choice

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

The activity was implemented and will be utilized as needed.

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

No

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

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

HASLC has the option of allocating project-based vouchers to shared housing and manufactured housing (pending software readiness). This change allows 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.

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

Housing choice

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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.

Activity not yet implemented (pending software readiness).

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

No

How many shared housing units does the MTW agency anticipate assisting in the Fiscal Year?

0

How many shared housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?

0

How many manufactured housing units does the MTW agency anticipate assisting in the Fiscal Year?

0

How many manufactured housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?

0

17.c. - Housing Development Programs

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

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

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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.

The activity was implemented and will be utilized as needed.

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

No

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 |
|---------------------------------|--|--|----------------------------|-----------------------|---|---|---|--|
| | | | | | | | | |

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 |
|---------------------------------|--|--|----------------------------|-----------------------|---|---|---|--|
| | | | | | | | | |

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 |
|---------------------------------|--|--|----------------------------|-----------------------|---|---|---|--|
|---------------------------------|--|--|----------------------------|-----------------------|---|---|---|--|

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 |
|---------------------------------|--|--|----------------------------|-----------------------|---|---|---|--|
|---------------------------------|--|--|----------------------------|-----------------------|---|---|---|--|

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

| | |
|------------|--|
| E. | Agency-Specific Waiver(s). |
| E.1 | <p>Agency-Specific Waiver(s) for HUD Approval:</p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</p> <p>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p>No Agency-Specific Waivers are being requested.</p> |
| E.2 | <p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>Does the MTW agency have any approved Agency-Specific Waivers?</p> <p>Yes</p> <p>Has there been a change in how the waiver is being implemented from when it was originally approved?</p> <p>No</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 |
|---------------------------|---|---|-----------------------------|------------|
| 2022 | \$443,382 | \$443,382 | \$0 | 2023-09-30 |
| 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. |
| Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency? Yes | |

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

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

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

| | |
|---|--|
| 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. |
| | Please see attached for an additional public hearing held for Agency-Specific Waiver(s) and/or Safe Harbor Waiver(s) |

| I. | Evaluations. |
|----|-----------------------|
| | No known evaluations. |

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (01/01/2024), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

Housing Authority of Salt Lake City

UT004

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).

Palmer DePaulis

Board Chair

NAME OF AUTHORIZED OFFICIAL

TITLE

Palmer DePaulis

9/25/2023

SIGNATURE

DATE

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

Safe Harbor Waiver: Payment Standards Fair Market Rents

HASLC plans to utilize MTW flexibility to increase payment standards up to 150% FMR as needed to meet community, agency, and household needs. HASLC would raise payment standards to up to 150% FMR at select projects that house special populations where additional services are provided (the additional services would be paid through the higher FMR). HASLC anticipates that only 2% of all units will be impacted by the proposed increase in payment standards.

HASLC has included an impact analysis and hardship policy in our submission and will implement them once the waiver is approved by HUD.

Payment Standards - Fair Market Rents (HCV) 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):** This activity will increase expenditures for the agency. We anticipate that only 2% of units will be impacted by the proposed increase in payment standards. HASLC's current payment standards are at 110% FMR. Based on the distribution of unit sizes, the estimated added cost for the waiver is just over \$415,000 in the first year. The agency's per family contribution will increase accordingly.
- 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):** This waiver will not impact housing costs for families, as there is no change to the TTP rent calculation process (e.g. clients will pay the same percentage of income towards rent that they would without the waiver).
- 3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist):** Historically, we have determined there are 10 to 12 households a year that exit the program due to income limitations and we expect that to increase over time as HASLC implements waivers to encourage self-sufficiency and increase income. The resulting increased household income, reduced HASLC rent portion, and attrition will balance out the cost-related impacts of this waiver, which will allow us to serve substantially the same number of families and see minimal impacts to the waitlist timeframe.
- 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):** No expected impact.
- 5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program:** The flexibility to raise payment standards to 150% FMR will increase HCV utilization rates, especially for special populations. There is no impact on the Public Housing side.
- 6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice:** This waiver will help meet the MTW statutory goal of housing choice by opening more units to HCV participants, especially for special populations.
- 7. Impact on the agency's ability to meet the MTW statutory requirements**
Ability to assist substantially the same number of households: With the added cost of this waiver, HASLC will have to closely monitor the number of assisted households. Other MTW activities that encourage self-sufficiency, such as tiered rent and alternative reexamination schedules will help offset any impact. These activities incentivize households to increase their income because there will be no impact to their rental portion until the next regular reexamination. As income increases and adjustments are made during the reexamination process we can assist more families because of the reduced HASLC payment. Landlord Incentive activities will also help increase our voucher utilization rate to help ensure we meet this statutory requirement. Other statutory objectives 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 waiver is not expected to impact the household's tenant portion. Therefore, we don't expect an increase in hardship requests with the implementation of the proposed activity.
- 9. Across all factors above, the impact on protected classes (and any associated disparate impact):** The proposed waiver will provide new options for housing choice for special populations.

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.

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.

Agency Analysis

No agency analysis was required, as the only comment received was related to the Moving to Work program name. Staff were able to alleviate the concern at the meeting by providing more information on the Moving to Work program.

Public Comments

A Resident Advisory Board member asked if residents will be made to go back to work because of the “Moving to Work” program. HASLC staff clarified that the Moving to Work (MTW) program is not synonymous with work requirements, but instead is a designation that allows the organization more flexibility to meet local needs.

No other public comments were received related to HASLC’s FY2024 MTW Supplement.

Agency Description

The FY2024 Agency PHA Plan and MTW Supplement Public Hearing was held at 10am on Wednesday, September 20, 2023, at 1776 South West Temple, Salt Lake City, Utah, 84115 and via webex. A second meeting was held immediately following the Public Hearing at 11 a.m. to discuss HASLC's proposed Safe Harbor Waiver (Payment Standards-Fair Market Rents).

No one from the public attended either meeting.