

PHA Name : Housing Authority Of The City Of Salem

PHA Code : OR011

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 10/1/2024

PHA Program Type: Combined

MTW Cohort Number: Asset Building

MTW Supplement Submission Type: Annual Submission



DRAFT

B. MTW Supplement Narrative.

Salem Housing Authority (SHA) is pleased to submit this Fiscal Year (FY) 2024 Moving to Work Supplement component of the Annual PHA Plan. HUD designated SHA as a Moving to Work (MTW) Agency in September 2022, through the MTW Asset Building Cohort, to test asset building initiatives to encourage growth of savings accounts, increased economic mobility, and/or credit building for assisted households. SHA's MTW Plan and Application selected the HUD-defined "Opt-Out Savings Account" as the initial MTW asset building activity. SHA looks forward to working with HUD and the evaluation team to develop and implement asset building activities and to better understand perspectives and experiences of households participating in the "Opt-Out Savings Account" initiative through the program evaluation process. Additionally, SHA will actively participate in the Community of Practice with HUD, the evaluation team, and other MTW agencies in the Asset Building Cohort to further develop and implement best practices related to this initiative.

This supplement identifies the MTW waivers and activities that SHA will implement in its first MTW Fiscal Year to achieve the three MTW statutory objectives, as well as the goals of the asset building cohort, which are outlined in more detail below.

Statutory Objective 1: Reduce cost and achieve greater cost-effectiveness in federal expenditures.

In our first year as a MTW agency, SHA will leverage MTW authority to implement a range of waivers to achieve administrative efficiencies and cost-effectiveness. These waivers will enable SHA to provide a higher level of customer service and connection with program participants, and to reduce administrative burden for participants and property owners. Program participants will benefit from alternative income inclusions / exclusions, alternative re-exam schedule, and self-certification of assets. Removal of requirements for third party assistance with certain Housing Quality Standards and Project-Based Voucher processes will eliminate administrative time spent coordinating with an Independent Entity to support program participants in more rapidly securing housing.

Streamlining the Rent Reasonableness process to compare units against current market studies will reduce the administrative time spent locating comparable units, maintaining, and updating a database of such comparable units, and will provide property owners with accessible information to determine whether their requested rents will likely meet the Rent Reasonableness test. Additionally, a simplified utility allowance schedule will make it simpler for staff to determine gross rent and tenant rent portions, as well as for program participants to search for housing that meets affordability guidelines.

A great deal of time is spent by both staff and program participants in determination of calculated deductions for medical expenses, disability expenses, and childcare. Eliminating calculated deductions and increasing the standard deductions for dependents and elderly/disabled households will have a net benefit for most households and will reduce time spent for staff, and for participants, in verifying these costs (which do not typically have a truly significant impact on the tenant rent calculation in the end).

Statutory Objective 2: Give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational, or other program that assist in obtaining employment and becoming self-sufficient.

A biennial recertification schedule, without the requirement for families to report increases in income between re-examinations, will provide families with more time between increases in rent, allowing them the opportunity to save money, pay off bills, and increase their economic mobility. SHA will provide families with information about this change in policy that will include information about community resources for asset-building, budgeting, and credit building that are available.

Statutory Objective 3: To increase housing choice for low-income families.

The strategy to promote housing choice and increase the supply of affordable housing will be achieved by increasing the Project-Based Voucher (PBV) program cap and PBV project cap. Expansion of the PBV program will provide new housing opportunities and will support the development of new units within our community.

Additionally, in a market where some property owners "price out" Voucher holders by raising rents in an effort to be above the 40% affordability threshold, increasing the threshold to 50% of adjusted monthly income will allow program participants additional choices when searching for and securing housing.

Economic Mobility (Asset Building Cohort Goal)

Implementation of the Opt-Out Savings Account initiative will be the focal point of SHA's initial economic mobility efforts. SHA plans to use the Opt-Out Savings Account program as a baseline for possible future economic mobility programs. This project will allow SHA to build and expand upon a network of partnerships with service providers, financial institutions, and other community-based organizations to promote economic mobility within our community.

Other activities to promote economic mobility include administrative changes to our rental assistance programs, such as alternative income inclusions/exclusions and an alternative re-examination schedule. We anticipate that these initiatives will

encourage assisted households to seek employment opportunities, increased wages, and build assets.

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	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Currently Implementing
j. Alternative Utility Allowance (HCV)	Currently Implementing
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Currently Implementing
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Currently Implementing
w. Alternative Income Inclusions/Exclusions (HCV)	Currently Implementing
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness – Process (HCV)	Currently Implementing
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)	Not Currently Implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Not Currently Implemented
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Currently Implementing
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
6. Short-Term Assistance	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	

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

C. MTW Activities Plan that Housing Authority Of The City Of Salem Plans to Implement in the Submission Year or Is Currently Implementing**1.i. - Alternative Utility Allowance (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**

SHA has created and implemented a utility allowance schedule that considers location, bedroom size, housing type (multifamily/shared wall or single family detached). The simplified schedule will be based on an average expense of the most common fuel types for heating, cooking, and water heating (electric and natural gas) from the utility suppliers within SHA's jurisdiction.

Updates to the household's utility allowance are applied at the next review or update, whether interim (including changes in contract rent for HCV households) or annual re-examination of eligibility.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. The utility schedule must be based upon number of bedrooms, property location, and/or the types of utilities paid by the participant.
- ii. The agency must review its schedule of utility allowances each year and revise its allowance for a utility category if there has been a change of 10 percent or more of the cost from the prior year. The agency must maintain information supporting its annual review of utility allowances and any revisions made in its utility allowance schedule.
- iii. The agency must not include items in the utility schedule that are excluded under HUD regulations.

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.

Alternative Utility Allowance schedule was created and implemented as of 01/01/2024.

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

No

Please describe the alternative method of calculating the utility allowances. Please explain how the method of calculating utility allowances is different from the standard method and what objective the MTW agency aims to achieve by using this alternative method.

Instead of providing a separate allowance for each fuel type, we average the most common fuel scenarios (for example, all electric, electric with gas heat, electric with gas heat and cooking, electric with gas heat, water heating and cooking) to create simplified figures for each bedroom size within multifamily (duplex, triplex, apartments) and single family units. Amounts for water, sewer, and garbage will also be determined. A flat figure, based upon 50% of the average of water and sewer, will be established for multifamily units with utility chargebacks. All of these figures will be rounded to the nearest \$5 to make them easier to add without the use of a calculator. Seldom-used fuel types (propane, heating oil, and wood) will not be considered in the determination of these averages.

Program participants and residents with higher utility needs may request reasonable accommodation to have additional expenses considered in the determination of their utility allowance.

1.j. - Alternative Utility Allowance (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

SHA has created a utility allowance schedule that considers location, bedroom size, housing type (multifamily/shared wall or single family detached). The simplified schedule will be based on an average expense of the most common fuel types for heating, cooking, and water heating (electric and natural gas) from the utility suppliers within SHA's jurisdiction.

Upon implementation and moving forward, updates to the household's utility allowance will be applied at the next review or update, whether interim (including changes in contract rent for HCV households) or annual re-examination of eligibility.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. The utility schedule must be based upon number of bedrooms, property location, and/or the types of utilities paid by the participant.
- ii. The agency must review its schedule of utility allowances each year and revise its allowance for a utility category if there has been a change of 10 percent or more of the cost from the prior year. The agency must maintain information supporting its annual review of utility allowances and any revisions made in its utility allowance schedule.
- iii. The agency must not include items in the utility schedule that are excluded under HUD regulations.

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.

The Alternative Utility Allowance Schedule was created and implemented as of 01/01/2024.

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

No

Please describe the alternative method of calculating the utility allowances. Please explain how the method of calculating utility allowances is different from the standard method and what objective the MTW agency aims to achieve by using this alternative method.

Instead of providing a separate allowance for each fuel type, we average the most common fuel scenarios (for example, all electric, electric with gas heat, electric with gas heat and cooking, electric with gas heat, water heating and cooking) to create simplified figures for each bedroom size within multifamily (duplex, triplex, apartments) and single family units. Amounts for water, sewer, and garbage will also be determined. A flat figure, based upon 50% of the average of water and sewer, will be established for multifamily units with utility chargebacks. All of these figures will be rounded to the nearest \$5 to make them easier to add without the use of a calculator. Seldom-used fuel types (propane, heating oil, and wood) will not be considered in the determination of these averages.

Program participants and residents with higher utility needs may request reasonable accommodation to have additional expenses considered in the determination of their utility allowance.

1.o. - Initial Rent Burden (HCV)**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

SHA has used MTW flexibility to increase housing choice by changing the Initial Rent Burden from 40% of Adjusted Monthly Income to 50% of Adjusted Monthly Income, allowing participating families greater choice for the communities they seek to reside in. The result will be an increased burden to the family should they choose to utilize this, but the effect on Housing Assistance Payment (HAP) will remain neutral.

Families will be advised at briefing, and at Voucher issuance, of the increased affordability threshold and the risks of choosing a higher rent burden.

This activity operates within the Safe Harbor requirements of the MTW Operations Notice:

- i. Agency must implement an impact analysis.
- ii. Agency must not allow the family share at initial occupancy to exceed 60% of the family's monthly income.

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

Housing choice

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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.

Initial Rent Burden of 50% Adjusted Monthly Income was implemented effective 01/01/2024.

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

No

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

50.00%

1.v. - Alternative Income Inclusions/Exclusions (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**

HUD regulations require the inclusion of regular non-cash contributions to the household (excluding food or reimbursement

for medical expenses). In some cases, the inclusion of non-cash contributions to the household may result in tenant rent responsibility when the household has no cash resources with which to pay rent, resulting in a situation that puts the household at risk for eviction for non-payment of rent, or having to seek other means of obtaining cash contributions, which could then be considered unreported income. This is especially challenging for tenants of Permanent Supportive Housing (PSH) projects where there are typically no tenant-paid utilities, so any amount of income creates a rent obligation for the family.

Tracking and verifying these contributions is an administrative burden for staff and is often challenging for program participants. Friends and family are hesitant to turn over cellular phone bills and other documentation of their contributions since these documents often contain details that are not directly related to the assisted household. In most cases, the contributions are minimal (typically less than \$100/month). The amount of administrative time spent documenting the contributions offsets the small amount of tenant rent that results by including them in the income calculation.

SHA excludes from income regular contributions made by someone outside of the assisted household that are not cash paid directly to a member of the household. "Regular" is defined as any contribution occurring three (3) or more times in a 12-month period. To be considered "regular," contributions do not need to come from the same individual or organization.

For example:

- A friend or family member outside of the assisted household pays for cellular phone service for the head of the household by paying the bill directly to the cellular company. Such contribution would be excluded from the income calculation.
- The household receives an average of four (4) deposits from friends and family members outside of the assisted household directly into the checking account of the head of the household. Because these contributions are regular (occurring 3 or more times in a 12-month period) and are cash, they would be annualized and included in the income calculation for the household.

Self-certification of non-cash contributions to the household will be accepted as verification of these amounts, which also provides relief to program participants from cumbersome reporting requirements and brings administrative relief to staff who will no longer have to spend time attempting to verify contributions, which is often administratively burdensome and requires multiple attempts.

Per the MTW Operations notice, safe harbor requirements require the agency to exempt elderly and disabled individuals from this rent determination policy; however, the exclusion of non-cash contributions to the household is beneficial to all participating households. Exempting elderly and disabled individuals would have a negative effect on those households.

SHA seeks a waiver from the requirement to exempt these individuals from this 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.

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.

Alternative Income Inclusions/Exclusions was implemented as of 01/01/2024.

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.

Application of the Safe Harbor for this initiative (exempting elderly and disabled individuals from alternative income exclusions) would have a negative disparate impact on participant households that include individuals who are elderly or disabled. The waiver of this requirement allows us to apply this benefit to all of our participants equally.

What inclusions or exclusions will be eliminated, modified, or added?

SHA excludes from income regular contributions made by someone outside of the assisted household that are not cash paid directly to a member of the household. "Regular" is defined as any contribution occurring three (3) or more times in a 12-month period. To be considered "regular," contributions do not need to come from the same individual or organization.

1.w. - Alternative Income Inclusions/Exclusions (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

HUD regulations require the inclusion of regular non-cash contributions to the household (excluding food or reimbursement for medical expenses). In some cases, the inclusion of non-cash contributions to the household may result in tenant rent responsibility when the household has no cash resources with which to pay rent, resulting in a situation that puts the household at risk for eviction for non-payment of rent, or having to seek other means of obtaining cash contributions, which could then be considered unreported income. This is especially challenging for tenants of Permanent Supportive Housing (PSH) projects where there are typically no tenant-paid utilities, so any amount of income creates a rent obligation for the family.

Tracking and verifying these contributions is an administrative burden for staff and is often challenging for program participants. Friends and family are hesitant to turn over cellular phone bills and other documentation of their contributions since these documents often contain details that are not directly related to the assisted household. In most cases, the contributions are minimal (typically less than \$100/month). The amount of administrative time spent documenting the contributions offsets the small amount of tenant rent that results by including them in the income calculation.

SHA excludes from income regular contributions made by someone outside of the assisted household that are not cash paid directly to a member of the household. "Regular" is defined as any contribution occurring three (3) or more times in a 12-month period. To be considered "regular," contributions do not need to come from the same individual or organization.

For example:

- A friend or family member outside of the assisted household pays for cellular phone service for the head of the household by paying the bill directly to the cellular company. Such contribution would be excluded from the income calculation.
- The household receives an average of four (4) deposits from friends and family members outside of the assisted household directly into the checking account of the head of the household. Because these contributions are regular (occurring 3 or more times in a 12-month period) and are cash, they would be annualized and included in the income calculation for the household.

Self-certification of non-cash contributions to the household will be accepted as verification of these amounts, which also provides relief to program participants from cumbersome reporting requirements and brings administrative relief to staff who will no longer have to spend time attempting to verify contributions, which is often administratively burdensome and requires multiple attempts.

Per the MTW Operations notice, safe harbor requirements require the agency to exempt elderly and disabled individuals

from this rent determination policy; however, the exclusion of non-cash contributions to the household is beneficial to all participating households. Exempting elderly and disabled individuals would have a negative effect on those households.

SHA seeks a waiver from the requirement to exempt these individuals from this 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.

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 alternative income exclusions were implemented 01/01/2024.

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.

Application of the Safe Harbor for this initiative (exempting elderly and disabled individuals from alternative income exclusions) would have a negative disparate impact on participant households that include individuals who are elderly or disabled. The waiver of this requirement allows us to apply this benefit to all of our participants equally.

What inclusions or exclusions will be eliminated, modified, or added?

SHA excludes from income regular contributions made by someone outside of the assisted household that are not cash paid directly to a member of the household. "Regular" is defined as any contribution occurring three (3) or more times in a 12-month period. To be considered "regular," contributions do not need to come from the same individual or organization.

2.c. - Rent Reasonableness – Process (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

Current rent reasonableness practices require the PHA to maintain a database of comparable units. The administrative burden of maintaining such a database and keeping information regarding comparable units up to date is overwhelming, especially in a volatile rental market where prices change almost daily.

SHA seeks to implement a unit-to-market rent reasonableness process, using semi-annual market studies conducted by a contracted organization. The market study will consider: location of the unit (zip code and neighborhood), type of unit (single family detached and multifamily/shared wall), age of unit (defined as pre-1990 and post-1990). Contract rent for the

assisted unit will be compared against the most recent study, and if it falls within the range defined in the market study it will be considered reasonable. Housing Inspectors and other knowledgeable PHA staff may use their market knowledge on a case-by-case basis to approve requested rents above the amount stated in the study for the particular housing type in its area (for example, if a pre-1990 unit has been renovated and is closer in condition to a post-1990 unit, the post-1990 amount may be used to determine reasonableness). Likewise, staff may use market knowledge to disapprove of a requested rent amount if the assisted unit is known to be in poor condition or have sub-standard upkeep. In these cases, staff must clearly document the reasoning behind the decision and Manager review and approval will be required. SHA will not approve requested rents for units that it owns or controls that exceed the applicable amount reflected in the rent survey.

Because rental listings for single family homes are much less common than for multifamily units within SHA's jurisdiction, the contracted organization may calculate a reasonable rent for single family homes within areas for which no data exists at the time of the publication of the study, based upon their professional experience and opinion.

On a quarterly basis, SHA shall randomly select fifteen (15) units for a detailed rent reasonableness quality control review, which is equivalent to approximately 2% of Voucher households assisted in a 12-month period. If a unit that is randomly selected is PHA-owned, the rent reasonableness quality control review will be conducted by a partnering organization (such as a neighboring PHA with which SHA has entered into an agreement for this service).

The proposed activity meets all safe harbor requirements:

1) Through the Administrative Plan, the agency shall make available the method used to determine that rents charged by owners to voucher participants are reasonable when compared to similar unassisted units in the market area.

2) At the Department's request, the agency must obtain the services of a third-party entity to determine rent

reasonableness for PHA-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.

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.

SHA is in the process of implementing the unit-to-market rent reasonableness process, due to delays in obtaining timely and adequate rent market surveys.

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

No

Describe the method used to determine rent reasonableness and the motivations for using a method different from the standard method.

SHA seeks to implement a unit-to-market rent reasonableness process, using semi-annual market studies conducted by a contracted organization. The market study will consider: location of the unit (zip code and neighborhood), type of unit (single family detached and multifamily/shared wall), age of unit (defined as pre-1990 and post-1990). Contract rent for the assisted unit will be compared against the most recent study, and if it falls within the range defined in the market study it will be considered reasonable. Housing Inspectors and other knowledgeable PHA staff may use their market knowledge on a case-by-case basis to approve requested rents above the amount stated in the study for the particular housing type in its area (for example, if a pre-1990 unit has been renovated and is closer in condition to a post-1990 unit, the post-1990 amount may be used to determine reasonableness). Likewise, staff may use market knowledge to disapprove of a requested rent amount if the assisted unit is known to be in poor condition or have sub-standard upkeep. In these cases,

staff must clearly document the reasoning behind the decision and Manager review and approval will be required. SHA will not approve requested rents for units that it owns or controls that exceed the applicable amount reflected in the rent survey.

2.d. - Rent Reasonableness – 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

SHA seeks to eliminate the requirement for a third-party to conduct rent reasonableness determinations for units that our agency owns or controls. SHA has a partnership with a neighboring PHA to conduct Housing Quality Standards and rent reasonableness determinations for units that it owns, which is time-consuming for both organizations. Conducting rent reasonableness determinations internally, using the unit-to-market method described under 2.c. will streamline processes and create cost effectiveness.

For quality control purposes, two percent of units owned or controlled by SHA and leased under the Section 8 program will be randomly selected for rent reasonableness review by a partnering organization (such as a neighboring PHA with which SHA has entered into an agreement for this service).

The proposed activity meets all safe harbor requirements:

- i. The agency shall establish and make available a quality assurance method to ensure impartiality.
- ii. The agency shall make available the method used to determine that rents charged by owners to voucher participants are reasonable when compared to similar unassisted units in the market area.
- iii. At the Department's request, the agency must obtain the services of a third party entity to determine rent reasonableness for PHA-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 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 was implemented 01/01/2024.

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.

For quality control purposes, two percent of units owned or controlled by SHA and leased under the Section 8 program will be randomly selected for rent reasonableness review by a partnering organization (such as a neighboring PHA with which SHA has entered into an agreement for this service).

No document is attached.

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

SHA seeks to implement a unit-to-market rent reasonableness process, using semi-annual market studies conducted by a contracted organization. The market study will consider: location of the unit (zip code and neighborhood), type of unit

(single family detached and multifamily/shared wall), age of unit (defined as pre-1990 and post-1990). Contract rent for the assisted unit will be compared against the most recent study, and if it falls within the range defined in the market study it will be considered reasonable. Housing Inspectors and other knowledgeable PHA staff may use their market knowledge on a case-by-case basis to approve requested rents above the amount stated in the study for the particular housing type in its area (for example, if a pre-1990 unit has been renovated and is closer in condition to a post-1990 unit, the post-1990 amount may be used to determine reasonableness). Likewise, staff may use market knowledge to disapprove of a requested rent amount if the assisted unit is known to be in poor condition or have sub-standard upkeep. In these cases, staff must clearly document the reasoning behind the decision and Manager review and approval will be required. SHA will not approve requested rents for units that it owns or controls that exceed the applicable amount reflected in the rent survey.

Because rental listings for single family homes are much less common than for multifamily units within SHA's jurisdiction, the contracted organization may calculate a reasonable rent for single family homes within areas for which no data exists at the time of the publication of the study, based upon their professional experience and opinion.

On a quarterly basis, SHA shall randomly select fifteen (15) units for a detailed rent reasonableness quality control review, which is equivalent to approximately 2% of Voucher households assisted in a 12-month period. If a unit that is randomly selected is PHA-owned, the rent reasonableness quality control review will be conducted by a partnering organization (such as a neighboring PHA with which SHA has entered into an agreement for this service).

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

SHA seeks to conduct recertifications of program eligibility on a biennial (every 2 years) basis rather than annually.

Reducing the frequency of recertifications allows participants to keep more of their income as their income increases. It also reduces the burden for staff and participants in acquiring, submitting, and processing paperwork. This change provides program participants with a longer time with stable rent to allow for better financial planning, budgeting, and housing security. Participants will have a greater ability to save for, and accomplish, goals such as pursuing education and rent independence.

Households reporting zero income will be required to report increases in income between reexaminations.

Participants experiencing a 10% or greater loss of gross income may request an interim adjustment to their income calculation. The number of interim adjustments that may be requested is not limited, however SHA will not adjust the income calculation in the event of less than a 10% loss of gross income.

The proposed activity meets all safe harbor requirements:

- 1) Reexaminations must occur at least every three years.
- 2) The agency must allow at least one interim adjustment per year at the request of the household if the household gross income has decreased 10% or more.
- 3) Agency must implement an impact analysis.
- 4) Agency must include a hardship 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 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 alternative reexamination schedule was implemented 01/01/2024.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

Yes

Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)

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

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

Yes

What considerations led the MTW agency to modify the hardship policy?

A Hardship Request form has been added to the policy.

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

No hardship were requested in the most recent fiscal year.

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

Yes

Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)

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

What is the recertification schedule?

Once every two years

How many interim recertifications per year may a household request?

2 or more

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

SHA will conduct reexaminations for all families at least every two (2) years.

Between reexaminations, participants may request an interim adjustment when they experience a decrease in gross income of 10% or greater.

Additionally, SHA will conduct interim adjustments to redetermine subsidy when the household experiences a qualifying event. Qualifying events will be described in the Housing Choice Voucher Administrative Plan and will include decreases in income of 10% or greater, increases in income (for households at zero/minimal income who are required to report changes in income or when requested by the household), changes in household composition, and changes to the contract rent or utility responsibility. When interim adjustments are conducted, SHA will apply payment standards and utility allowances in effect on the effective date of the adjustment.

SHA will reserve the right to conduct reexaminations more frequently either for administrative or other financial reasons.

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

SHA conducts recertifications of program eligibility on a biennial (every 2 years) basis rather than annually.

Reducing the frequency of recertifications allows participants to keep more of their income as their income increases. It also reduces the burden for staff and participants in acquiring, submitting, and processing paperwork. This change provides program participants with a longer time with stable rent to allow for better financial planning, budgeting, and housing security. Participants will have a greater ability to save for, and accomplish, goals such as pursuing education and rent independence.

Households reporting zero income will be required to report increases in income between reexaminations.

Participants experiencing a 10% or greater loss of gross income may request an interim adjustment to their income calculation. The number of interim adjustments that may be requested is not limited, however SHA will not adjust the income calculation in the event of less than a 10% loss of gross income.

SHA will apply the most recent Payment Standard in effect when processing contract rent increases between reexaminations to reduce the impact / rent burden on participating families (without completing a full income reexamination).

The proposed activity meets all safe harbor requirements:

- 1) Reexaminations must occur at least every three years.
- 2) The agency must allow at least one interim adjustment per year at the request of the household if the household gross income has decreased 10% or more.
- 3) Agency must implement an impact analysis.
- 4) Agency must include a hardship 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 to all assisted households

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

N/A - this is the first year of MTW implementation.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

Yes

Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)

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

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

Yes

What considerations led the MTW agency to modify the hardship policy?

Addition of a hardship request form.

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

No hardship were requested in the most recent fiscal year.

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

Yes

Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)

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

What is the recertification schedule?

Once every two years

How many interim recertifications per year may a household request?

2 or more

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

SHA will conduct reexaminations for all families at least every two (2) years.

Between reexaminations, participants may request an interim adjustment when they experience a decrease in gross income of 10% or greater.

Between reexaminations, SHA will apply the most recent Payment Standard that is in effect when processing changes in contract rent without requiring a full income reexamination.

Additionally, SHA will conduct interim adjustments to redetermine subsidy when the household experiences a qualifying event. Qualifying events will be described in the Housing Choice Voucher Administrative Plan and will include decreases in income of 10% or greater, increases in income (for households at zero/minimal income who are required to report changes in income or when requested by the household), changes in household composition, and changes to the contract rent or utility responsibility. When interim adjustments are conducted, SHA will apply payment standards and utility allowances in effect on the effective date of the adjustment.

SHA will reserve the right to conduct reexaminations more frequently either for administrative or other financial reasons.

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

At determination of initial eligibility / new admission, SHA will verify all family assets in accordance with the Admissions and Continued Occupancy Plan requirements.

At reexamination, SHA will allow the self-certification of assets with a total value of up to \$50,000 for the household. Reduced documentation requirements will reduce staff time for processing, thereby increasing efficiency and cost effectiveness. Reducing documentation saves time for staff and the majority of program participants whose assets do not impact their level of benefits. Third-party verification of assets for participant families will not be required on a regular schedule, but SHA will reserve the right to verify assets via third party for administrative or other financial reasons.

The proposed activity meets all safe harbor requirements:

- i. At reexamination, the agency may allow the self-certification of assets only up to \$50,000.

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.

This activity was implemented 01/01/2024.

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**

At determination of initial eligibility / new admission, SHA will verify all family assets in accordance with the Housing Choice Voucher Administrative Plan.

At reexamination, SHA will allow the self-certification of assets with a total value of up to \$50,000 for the household. Reduced documentation requirements will reduce staff time for processing, thereby increasing efficiency and cost effectiveness. Reducing documentation saves time for staff and the majority of program participants whose assets do not impact their level of benefits. Third-party verification of assets for participant families will not be required on a regular schedule, but SHA will reserve the right to verify assets via third party for administrative or other financial reasons.

The proposed activity meets all safe harbor requirements:

- i. At reexamination, the agency may allow the self-certification of assets only up to \$50,000.

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 revenue

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

The MTW activity applies to all assisted households

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 was implemented 01/01/2024.

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

No

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

\$50,000.

5.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**

SHA has eliminated the requirement for a third party to conduct Housing Quality Standards (HQS) inspections for units that our agency owns or controls. SHA has a partnership with a neighboring PHA to conduct Housing Quality Standards and rent reasonableness determinations for units that it owns, which is time-consuming for both organizations. Conducting HQS inspections internally will streamline processes and create cost effectiveness.

For quality control purposes, two percent of units owned or controlled by SHA and leased under the Section 8 program will be randomly selected for HQS inspection quality control review by a partnering organization (such as a neighboring PHA with which SHA has entered into an agreement for this service).

The proposed activity meets all Safe Harbor requirements outlined in the MTW Operations Notice:

- i. The agency shall establish and make available a quality assurance method to ensure impartiality.
- ii. The participant must be able to request an interim inspection.

- iii. HQS inspection standards must not be altered as found at 24 CFR 982.401.
- iv. At the Department's request, the agency must obtain the services of a third party entity to determine if PHA-owned units pass HQS.

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.

This activity was implemented 01/01/2024.

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

For quality control purposes, two percent of units owned or controlled by SHA and leased under the Section 8 program will be randomly selected for HQS inspection quality control review by a partnering organization (such as a neighboring PHA with which SHA has entered into an agreement for this service).

No document is attached.

9.h. - Limit Portability for PBV Units (HCV)**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

SHA has used MTW flexibility to change the current requirement to provide a tenant-based Housing Choice Voucher requested by a Project-Based Voucher (PBV) household from 12 months of PBV tenancy to 24 months. Tenant-based Vouchers are very limited in our community. As our portfolio of PBV units increases to meet community need, more frequent requests for Housing Choice Vouchers are anticipated. These requests delay our ability to serve low-income community members from the waiting list.

This change ensures that households electing to move into a PBV unit cannot convert to a tenant-based Voucher after only one year, effectively bypassing the HCV waiting list. Additionally, it decreases the administrative burden for staff after initial intake.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. Portability under this activity must not be restricted for more than 24 months.
- ii. The agency must have a clear and uniform policy in place to address how move requests are received and how they are approved/denied for PBV households.
- iii. Participants must still retain the ability to request a tenant-based voucher for reasonable accommodation according to existing rules.

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.

This activity was implemented 01/01/2024.

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

No

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

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

<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>					
E.2	Title	Has there been a change in how the waiver is being implemented from when it was originally approved?	Please provide a description of what has changed.	Please provide a description of the final outcomes and lessons learned from implementing this Activity at your PHA.	If the MTW Agency was previously required to prepare an impact analysis, was a final impact analysis prepared at the time of discontinuation?
	Self-Certification of Expenses	No			
	Self-Certification of Expenses	No			
	Self-Certification of Expenses	No			

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	\$650,100	\$483,201	\$166,899	
2022	\$677,680	\$505,345	\$172,335	
2023	\$610,058	\$327,947	\$282,111	
2024	\$507,351	\$157,268	\$350,083	

G.	MTW Statutory Requirements.										
G.1	<p>75% Very Low Income – Local, Non-Traditional.</p> <p>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.</p>										
	<table border="1"> <thead> <tr> <th>Income Level</th><th>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</th></tr> </thead> <tbody> <tr> <td>80%-50% Area Median Income</td><td>0</td></tr> <tr> <td>49%-30% Area Median Income</td><td>0</td></tr> <tr> <td>Below 30% Area Median Income</td><td>0</td></tr> <tr> <td>Total Local, Non-Traditional Households</td><td>0</td></tr> </tbody> </table>	Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*	80%-50% Area Median Income	0	49%-30% Area Median Income	0	Below 30% Area Median Income	0	Total Local, Non-Traditional Households	0
Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*										
80%-50% Area Median Income	0										
49%-30% Area Median Income	0										
Below 30% Area Median Income	0										
Total Local, Non-Traditional Households	0										

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

G.2	Establishing Reasonable Rent Policy.
<p>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?</p> <p>Yes</p>	

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	# 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.
<p>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.</p>	

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

H.	Public Comment
Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.	
Please see attached for an additional public hearing held for Agency-Specific Waiver(s) and/or Safe Harbor Waiver(s)	

I.	Evaluations.
No known evaluations.	

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (10/01/2024), 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 the City of Salem
(dba Salem Housing Authority)

OR011

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).

Virginia Stapleton

Commission Chair

NAME OF AUTHORIZED OFFICIAL

TITLE



DRAFT

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.*



3.a., b. Alternative Reexamination Schedule for Households (HCV and PH) – Impact Analysis

Savings related to this activity are anticipated (staff time, office supplies, postage), but no impact on agency finances is expected.

Following the implementation of the alternative reexamination schedule for Housing Choice Voucher families on January 1, 2024, SHA determined that there was an inadvertent impact on affordability of housing costs for families who experience an increase in contract rent between biennial recertifications. To mitigate this impact, SHA updated the Housing Choice Voucher Administrative Plan to implement application of the current payment standard in effect when processing rent increases between biennial recertifications (without requiring a full income reexamination). There is no other anticipated impact on affordability of housing costs for affected families participating in the Housing Choice Voucher program.

There is no anticipated impact on affordability of housing costs for affected families participating in the Public Housing program.

There is no anticipated impact on the agency's waiting list.

There is no anticipated impact on the agency's termination rate of families.

There is no anticipated impact on the occupancy and utilization rates.

SHA anticipates an increase in administrative efficiency and cost-effectiveness by implementing this initiative. SHA anticipates approximately 1,000 hours in time savings per year by shifting participating households to a biennial recertification schedule.

There is no anticipated impact on the agency's ability to meet MTW statutory requirements.

Hardship requests are not anticipated.

There is no anticipated disparate impact to protected classes as a result of this activity.



1. o. Initial Rent Burden (HCV) – Impact Analysis

SHA finances will remain neutral.

Families who choose to take advantage of the 50% rent burden will pay more towards their housing costs but will be given more choice in choosing their housing options. There is no effect on the waiting list.

Participant families may request an interim adjustment to their rent in the event of a 10% or more loss of gross income, or they may request a hardship request to have a higher payment standard applied to their rent calculation outside of their regularly scheduled reexamination schedule in the event that they do not experience a loss of income.

This activity will not impact the waiting list.

Increased terminations are not anticipated; however, SHA will track terminations relating to non-payment of rent. If it is determined that this MTW activity increases the rate of terminations relating to non-payment of rent, its implementation will be re-evaluated in subsequent years. **The activity was implemented effective 01/01/2024; to date, no terminations due to non-payment of rent have been attributed to the MTW activity.**

It is anticipated that this MTW activity will have a positive impact on housing choice and occupancy, allowing families a wider range of units to select and lease with their Vouchers.

This activity will not impact SHA's ability to meet MTW statutory goals.

Hardship requests are not anticipated.

This activity will not have disparate impact on protected classes.



MTW Hardship Policy

SHA offers a hardship policy when households have mitigating circumstances and believe a MTW activity constitutes a financial or other hardship for the family. To qualify for a hardship, the family must be following all program rules and regulations, not owe SHA any money (or be current in a repayment agreement if money is owed).

SHA will post information about its hardship policy on its website, will provide information about the hardship policy at intake and at regular reexamination, and will consider whether a participant qualifies for a hardship exemption at the time of potential termination of assistance if the termination is related to a MTW activity.

Households must submit requests for the MTW Hardship Policy in writing. A form is provided for this purpose, but its use is not required. Similar to SHA policies relating to interim adjustments, if approved, a reported change must be received by SHA no later than the 20th of the month for the MTW activity to be suspended the first of the following month. Reported changes received by the PHA between the 21st and final day of the month will be effective the first of the second month following the report of the change. For example:

- Change reported October 15th: MTW activity will be suspended November 1st.
- Change reported October 22nd: MTW activity will be suspended December 1st.

Households must identify which MTW activity they are requesting to be suspended:

- Self-Certification of Allowable Expenses (Agency-Specific Waiver)
- Alternative Income Exclusions (1.v., 1.w.)
- Alternative Reexamination Schedule (3.a., 3.b.)

Households must identify the situation that qualifies them for hardship:

- Family has experienced an increase in expenses of more than 25%, such as a large medical expense or significant increase in childcare costs.
- Family has experienced a change in circumstances resulting in a hardship related to the exclusion of non-cash contributions to the household.
- Family has experienced an increase in income that may provide them other benefits if implemented (for example, families participating in the FSS program) and wish to request more frequent reexaminations.

If a hardship request is approved, the MTW activity will be suspended, and the family's rent calculation will be based on non-MTW regulations. **Please note that calculating rent based on non-MTW regulations may not always result in a rent reduction.** The hardship will be effective until the next annual update or review, up to 12 months.

If a hardship request is not approved, the family will have the right to appeal the decision for further review. If the appeal is denied, the family will have the right to request an informal hearing to review the household income and rent calculation. The informal hearing will be conducted by the SHA Hearings Officer or a member of the management team who was not involved in the decision.

Salem & Keizer's Largest
Affordable Housing Provider
503.588.6368
TDD Users: Dial 711
Fax: 503.588.6465



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Salem, Oregon 97301

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SalemHousingOR.com



MTW HARSHIP REQUEST

Hardship requests may be made by completing this form and submitting it, along with supporting documentation.

Date: _____ Contact Phone Number: _____

Head of Household Name: _____

Address: _____

New Hardship Request

Hardship Extension Request

Please check the box indicating the type of hardship you are experiencing and provide a short explanation of how this circumstance creates a financial hardship.

- Family has experienced an increase in expenses of more than 25%, such as a large medical expense or significant increase in childcare costs.
- Family has experienced a change in circumstances resulting in a hardship related to the exclusion of non-cash contributions to the household.
- Family has experienced an increase in income that may provide them other benefits if implemented and wish to request more frequent reexaminations.

Please explain how this circumstance creates a financial hardship (attach additional sheet(s) if necessary):

Attach supporting documentation to this form, such as receipts or printouts documenting an increase in expenses, documentation of income increase, or an explanation of how the exclusion of non-cash contributions to the household create a hardship.

Under penalties of perjury, I certify that the information presented in this Request is true and accurate to the best of my/our knowledge and belief. The undersigned further understands that providing false representations herein constitutes an act of fraud. False, misleading, or incomplete information may result in the termination of the lease agreement.

Head of Household Signature

Date

For Staff Use Only

Date Received: _____

By (Staff Initials): _____

Determination: Approved Denied

If approved: Start Date: _____

End Date: _____

Deciding Authority Signature

Date

Notes/Additional Info: