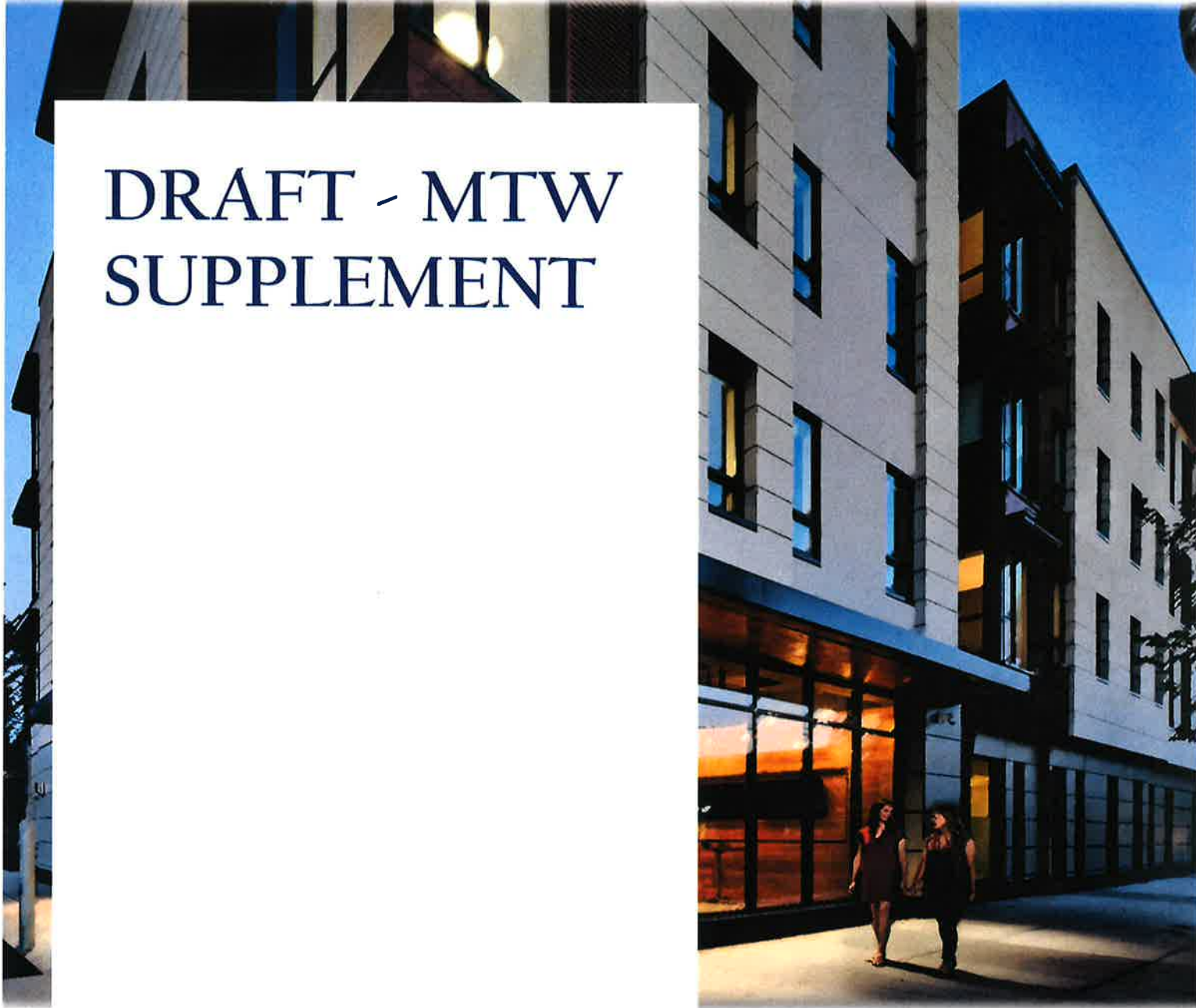


DRAFT - MTW SUPPLEMENT

AUGUST 2024

WEST HARTFORD HOUSING AUTHORITY



MTW Supplement to the Annual PHA Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

OMB No. 2577-0226
Expires: 03/31/2025

Purpose. The Moving to Work (MTW) Supplement to the Annual PHA Plan informs HUD, families served by the PHA, and members of the public, about the MTW Waivers and associated activities that the MTW agency seeks to implement in the coming Fiscal Year and updates the status of MTW activities that have been previously approved. It also provides information about Safe Harbor Waivers, Agency-Specific Waivers, compliance with MTW statutory requirements, and evaluations. The MTW Supplement does not replace the PHA Plan. MTW agencies must continue to submit the applicable PHA Plan. MTW agencies that are not required to submit annual PHA Plans under the Housing and Economic Recovery Act of 2008 (HERA) must submit the MTW Supplement annually, in addition to holding public hearings, obtaining board approval, and consulting with Resident Advisory Boards (RABs) and tenant associations, as applicable, on planned MTW activities.

Applicability. Form HUD-50075-MTW is to be completed annually by all MTW agencies brought onto the MTW Demonstration Program pursuant to Section 239 of the Fiscal Year 2016 Appropriations Act, P.L. 114-113 (2016 MTW Expansion Statute) or legacy MTW agencies² that chose to follow the requirements of the MTW Operations Notice.

Definitions. All terms used in this MTW Supplement are consistent with the definitions stated in the MTW Operations Notice, including:

- (1) **Local, Non-Traditional Activities (LNT)** – Those MTW activities that use MTW funding flexibility outside of the Housing Choice Voucher (HCV) and public housing programs established in Sections 8 and 9 of the U.S. Housing Act of 1937.
- (2) **Safe Harbors** – The additional parameters or requirements, beyond those specified in the MTW activity description itself found in the MTW Operations Notice, following each activity description, that the MTW agency must follow in implementing MTW activities.
- (3) **Substantially the Same Requirement** – A statutory MTW requirement that MTW agencies must continue to assist substantially the same total number of eligible low-income families as would have been served absent the MTW demonstration.

A.	PHA Information.
A.1	<p>PHA Name: West Hartford Housing Authority PHA Code: CT039 MTW Supplement for PHA Fiscal Year Beginning: 1/01/2025 PHA Program Type: Housing Choice Voucher MTW Cohort Number: 5 MTW Supplement Submission Type: Annual Submission</p>
B.	Narrative.
B.1	<p>MTW Supplement Narrative. The narrative provides the MTW agency with an opportunity to explain to the public, including the families that it serves, its MTW plans for the fiscal year and its short and long-term goals.</p> <p>The MTW agency should provide a description of how it seeks to further the three MTW statutory objectives during the coming Fiscal Year. Those three MTW statutory objectives are: (1) to reduce cost and achieve greater cost effectiveness in federal expenditures; (2) to give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient, and (3) to increase housing choices for low-income families.</p>

B. Narrative

Vision for PHA's Local MTW Program

The West Hartford Housing Authority is pleased to submit this application for the MTW Demonstration Program. We believe that our participation in MTW will help us further our mission. As described below, the West Hartford Housing Authority's overall vision for its Moving to Work (MTW) program focuses on the three statutory objectives of the MTW Demonstration Program:

- Reduce costs and achieve greater cost-effectiveness in federal expenditures;
- Give incentives to families with children where the head of household is working, seeking work, or preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
- Increase housing choices for low-income families.

We have a vision where WHHA can maximize the number of households served through the voucher program and making changes to the voucher program to make it more efficient to operate, more likely to increase the self-sufficiency of its participants, and more likely to attract and retain landlords and housing providers. WHHA has a vision to create locally designed programs which address the challenges we see in the Town of West Hartford, CT. Our vision focuses on the three MTW statutory objectives: cost effectiveness, self-sufficiency and housing choice.

WHHA's Moving to Work application looks at improving client lives to help meet their needs, improving service access and solutions, creating administrative relief, and providing better benefits for those qualifying households. MTW changes and flexibility will enable the West Hartford Housing Authority to further its partnerships with other agencies and state governments to provide stable and affordable housing opportunities and solutions to existing barriers.

WHHA seeks to reduce the administrative and regulatory burden for WHHA staff, clients and landlords/housing providers that we serve. WHHA seeks to increase housing choice options and to increase service providers' participation with our agency. Through the MTW demonstration program, WHHA wants to be able to be more effective with clients that we serve, by reducing their financial burdens, further coordinating services and / or helping them to coordinate services so that WHHA can be more aligned with their needs for housing purposes.

Through a combination of MTW waivers and activities under HUD's MTW Operations Notice we have selected a number of safe harbor waivers. As a result, WHHA will be able to implement a more comprehensive approach to administering our voucher program. WHHA will also seek opportunities to apply for additional vouchers in the future, so that we can assist additional eligible households.

Self-Sufficiency: Our vision is that self-sufficiency would increase amongst our program participants. We want to establish policies and provide resources and services that enable stability and motivate personal growth. We believe that through a combination of policy changes and partnering with other Health and Human Service and Department of Labor agencies and benefit programs, WHHA will be able to make changes that will encourage an increase in self-sufficiency.

The West Hartford Housing Authority would like the ability to develop housing that meets community needs, and to help low-income household secure decent, safe, sanitary and affordable housing with the option of coordinating or collaborating with different services to become self-sufficient.

Cost Effectiveness: We look forward to implementing changes in the voucher program that will reduce the cost to

administer the program by eliminating or simplifying regulations and processes that present existing barriers to participants, landlords/housing providers, and program administrative staff.

WHHA would have biennial reexaminations for elderly/disabled households on fixed-incomes and without any dependents. This activity will provide greater cost efficiency to administering WHHA's voucher program. This activity will help households and provide greater cost efficiency in administering WHHA's voucher program.

WHHA would eliminate the selection process in the award of PBVs to properties owned and/or substantially controlled by the agency that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site. This activity will provide greater cost efficiency to administering WHHA's voucher program. WHHA would establish an alternative competitive process in the award of PBVs that are owned by non-profit, for-profit housing entities, or by the agency that are not public housing. This activity will provide greater cost efficiency to administering WHHA's voucher program.

WHHA would implement exception payment standards up to 150 % of applicable SAFMRs for households that qualify and request a reasonable accommodation. This activity will help households secure increased housing choice and help achieve greater cost-effectiveness.

WHHA believes that coordination with education, employment preparation and employment service grant programs provide meaningful opportunities for non-elderly / non-disabled households to meet the minimum income requirement being set by the agency. This activity would increase self-sufficiency and achieve greater program cost opportunities.

There are a number of challenges serving low-income households in our communities, including a range of impacts on inflated costs on the rental housing markets and utilities. Through the MTW waivers and WHHA's activities, these new changes will encourage increased landlord participation and create more opportunities for housing and affordability and accessibility within our community.

The MTW demonstration program will help WHHA maximize our ability to lease as efficiently and effectively as possible and to achieve other voucher program goals. MTW flexibility will serve to enhance our existing practices. These flexibilities will allow WHHA to assist more households to become self-sufficient and, in so doing, we will be able to serve more unassisted households each year.

Housing Choice: In the area of housing choice, WHHA will explore changes that will increase landlord participation as well as policies that will allow the voucher participants more housing options, as well as remaining committed to serving as many households as the program funding will allow. We also view the range of interventions and activities in our proposal as an effective approach for eviction prevention, financial stability and housing stability.

WHHA has shown that in tight housing markets, low-income families have barriers to leasing because they lack the necessary funds for application fees. WHHA proposes using Housing Assistance Payments (HAP) funds to pay for some of the landlord incentives in PIH Notice 2022-18, including application fee expenses for newly admitted qualified participants. These activities will help unassisted households secure their choice of qualified housing and encourage goals of self-sufficiency. Administrative relief will be derived from lowering the number of voucher holders who cannot find a place to use their voucher and helping clients find suitable housing faster with fewer applications.

For voucher-assisted households where the utility allowance for tenant-paid utilities exceeds 30 percent of their monthly adjusted income resulting in a utility allowance payment, WHHA would send the payment to the utility provider(s) to ensure that the allowance went towards paying their utilities and to help prevent some households from receiving utility shutoff notices due to non-payment. This activity helps preserve households' housing choice and helps achieve greater cost-effectiveness.

Activity: 2.a. – Payment Standards – Small Area Fair Market Rents (FMR) (HCV)

Narrative. 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.

Description:

This activity will allow WHHA to adopt and implement a reasonable policy to establish payment standards based upon applicable Small Area Fair Market Rents (SAFMRs). WHHA may use this flexibility to establish payment standards between 80% and 150% of the applicable SAFMRs in our service area, based on a range of voucher programmatic outcomes, private market unassisted rents, census data, etc., or may establish payment standards for each ZIP code within its jurisdiction. Among the geographic considerations is grouping ZIP codes within SAFMRs.

Agency Goals for the MTW Activity:

WHHA’s goal is to utilize a comprehensive approach to expand housing opportunities for HCV participants and to increase landlord participation in the HCV Program.

For WHHA to increase the number of families served, maintaining affordable income to housing cost burdens overall, ensuring good housing quality stock and providing opportunities to lease in opportunity areas, utilizing SAFMRs as the basis for WHHA’s payment standards within the 80% to 150% range in ZIP codes in our service area, in conjunction with its “rent reasonableness” system is intended to help achieve these goals. Over time, the use of SAFMR-based payment standards that are more finely attenuated to submarkets within WHHA’s service area. This will result in relatively greater HAP expenditures in some areas and relatively lower HAP expenditures in other areas, with modest HAP cost savings. In all instances, WHHA’s payment standards will provide equal access and affordability to all submarkets to its voucher holders / voucher-assisted households.

MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?

Housing choice and self-sufficiency.

Cost implications. 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

Different policy by household status/family types/sites? 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 family types

Household Status. 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
Family Types. Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For PH activities: Does the MTW activity apply to all public housing developments?</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities: The MTW activity applies to all tenant-based units and properties with project-based vouchers</p>
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	Yes
Does the MTW activity require an impact analysis?	Yes

Custom Questions: Custom questions are tailored to each MTW activity.	
Please explain the payment standards by FMR?	<p>Grouped or individual ZIP codes based on a range of voucher programmatic outcomes, private market unassisted rents, census data, etc.</p> <p>Through this activity, WHHA plans to increase housing choice and opportunities and deconcentrating poverty for HCV participants in neighborhoods that have access to jobs, good schools, healthcare, a healthy environment, healthy foods, safe neighborhoods, and transportation services.</p>

Activity: C2.d. Rent Reasonableness – Third-Party Requirement (HCV)

<p>Narrative. 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><i>Description:</i> WHHA will use MTW flexibility to perform rent reasonable determinations on units that it owns, manages, and/or controls. WHHA will make reasonable rent determinations with the support of third-party software that taps into a national database. This process will ensure fair and valid determinations, to ensure quality control and transparency.</p> <p>A third-party contractor to conduct rent reasonableness in these cases, is time consuming and costly. Conducting rent reasonableness calculations internally will streamline processes and create cost effectiveness. The program allows Quality Control reviews of the rent reasonableness in which an auditor has access to perform quality control audits on the rent reasonableness determination. Rent reasonableness documentation will still be transmitted for Subsidy Layering Reviews.</p> <p><i>Agency goals for MTW Activity:</i> Increase rent reasonable turn window to support on-time reporting. This waiver supports WHHA’s larger goal of using MTW flexibility to streamline administrative processes and reduce agency costs.</p>
<p>MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>Cost effectiveness</p>
<p>Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p>	<p>Decreased expenditures</p>
<p>Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p>	<p>The MTW activity applies to all assisted households</p>
<p>Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p>	<p>New admissions and currently assisted households</p>
<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	<p>The MTW activity applies to all family types</p>
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities: The MTW activity applies to all tenant-based units and properties with project-based vouchers.</p>

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	Yes
Does this MTW activity require a hardship policy?	Yes
Does the MTW activity require an impact analysis?	Yes

Custom Questions: Custom questions are tailored to each MTW activity.

Please explain or upload a description of the quality assurance method.	<p>Reasonable rent determinations will be made with the support of a third-party database that is updated annually based on market conditions.</p> <p>The program allows for quality control reviews of the rent reasonableness in which an auditor has access to perform quality control audits on the rent reasonableness determination. Rent reasonableness documentation will still be transmitted for Subsidy Layering Reviews.</p>
Please explain or upload a description of the rent reasonableness determination method.	<p>The agency will determine rent reasonableness with the support of third-party software. The software's processes and certification of each review adheres to HUD's rent reasonableness standards. WHHA will consider information for each type of unit, including location, quality, size, type, age of unit, amenities, maintenance, and utilities to be provided by the owner. The process includes comparable based on up-to- date market units and costs.</p>

Activity: 3.d. Self-Certification of Assets	
<p>Narrative. 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><i>Description:</i> WHHA will allow participants and applicants (through a safe harbor waiver) to self-certify their assets up to \$50,000.</p> <p><i>Agency goals for MTW Activity:</i> Decrease administrative time and costs required to follow up and secure documents, allowing staff to focus on other priorities. This may also lower barriers to participants in obtaining asset verification. This waiver may improve cost effectiveness in our effort to reduce administrative burden while still maintaining the integrity of the rent calculation process. Staff spend substantial amounts of administrative time verifying assets that do not impact participants' rent portions. Participants know the approximate balances in their accounts and rarely receive interest payments. By allowing them to self-certify, WHHA will free up staff time to accomplish other tasks and require less burdensome documentation of participants.</p>
<p>MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?</p>	Cost Effectiveness
<p>Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p>	Decreased expenditures
<p>Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p>	The MTW activity applies to all assisted households
<p>Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p>	Both new admissions and currently assisted households?
<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	The MTW activity applies to all family types
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities: The MTW activity applies to all tenant-based units and units with project-based vouchers.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	No
<p>Does this MTW activity require a hardship policy?</p>	No
<p>Does the MTW activity require an impact analysis?</p>	No
Custom Questions: Custom questions are tailored to each MTW activity.	
<p>Please state the dollar threshold for the self-certification of assets.</p>	\$50,000

Custom Questions: Custom questions are tailored to each MTW activity.

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?)	<input checked="" type="checkbox"/> To all units [No follow-up questions]
Maximum payment to the landlord is \$?	\$1,000
How many payments were issued under this policy in the most recently completed PHA fiscal year? ___ [number of payments]	N/A
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?	N/A

Activity: C 9.a. Increase PBV Program Cap (HCV)	
<p>Narrative. 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><i>Description:</i> WHHA will increase the number of authorized units it project-bases.</p> <p><i>Agency goals for MTW Activity:</i></p> <p>The PBV program offers households fixed housing costs at a 30% affordability threshold. This allows assisted households to budget, plan and save toward future goals, all of which support self-sufficiency. Coupled with supportive services targeted to each population type and household, WHHA believes that a significantly number of households will achieve increased self-sufficiency.</p>
<p>MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?</p>	Self-Sufficiency
<p>Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p>	Neutral (no cost implications)
<p>Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p>	The MTW activity applies to all assisted households
<p>Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p>	New admissions and currently assisted households

<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	The MTW activity applies to all family types
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities: The MTW activity applies to properties with project-based vouchers</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	No
<p>Does this MTW activity require a hardship policy?</p>	No
<p>Does the MTW activity require an impact analysis?</p>	No
Custom Questions: Custom questions are tailored to each MTW activity.	
<p>What percentage of total authorized HCV units will be authorized for project-basing?</p>	Not to exceed 50%

Activity: C 9.b. Increase PBV Project Cap (HCV)	
<p>Narrative. 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><i>Description:</i> WHHA may raise the Project Based Voucher cap within a project up to 100%.</p> <p><i>Agency goals for MTW Activity:</i> Create family stability in an environment with support to encourage family self-sufficiency.</p>
<p>MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?</p>	Self-Sufficiency
<p>Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p>	Neutral (no cost implications)
<p>Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p>	The MTW activity applies to all assisted households

<p>Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p>	New admissions and currently assisted households
<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	The MTW activity applies to all family types
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For PH activities: Does the MTW activity apply to all public housing developments?</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities: The MTW activity applies to all properties with project-based vouchers</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	No
<p>Does this MTW activity require a hardship policy?</p>	No
<p>Does the MTW activity require an impact analysis?</p>	No

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

<p>Narrative. 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><i>Description:</i> WHHA will eliminate the selection process in the award of PBV to properties owned by the agency that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site.</p> <p><i>Agency goals for MTW Activity:</i> Streamline the selection process for PBV. This waiver supports WHHA's larger goal of using MTW flexibility to streamline administrative processes.</p>
<p>MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>Cost effectiveness</p>
<p>Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p>	<p>Decreased expenditures</p>
<p>Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p>	<p>The MTW activity applies to all assisted households</p>
<p>Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p>	<p>New admissions and currently assisted households</p>
<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	<p>The MTW activity applies to all family types</p>
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For PH activities: Does the MTW activity apply to all public housing developments?</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities: The MTW activity applies to all properties with project-based vouchers</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	<p>No</p>
<p>Does this MTW activity require a hardship policy?</p>	<p>No</p>
<p>Does the MTW activity require an impact analysis?</p>	<p>No</p>

Activity: C.9.d. Alternative PBV Selection Process (HCV)	
<p>Narrative. 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><i>Description:</i></p> <p>The agency may establish an alternative competitive process in the award of PBVs for properties that are owned by non-profit, for-profit housing entities, or by the agency, that are not public housing properties.</p> <p><i>Agency goals for MTW Activity:</i></p> <p>WHHA's goal for this request is to increase cost effectiveness by eliminating this process and increase housing choice.</p>
<p>MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>Cost effectiveness</p>
<p>Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p>	<p>Decreased expenditures</p>
<p>Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p>	<p>The MTW activity applies to all assisted households</p>
<p>Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p>	<p>New admissions and currently assisted households</p>
<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	<p>The MTW activity applies to all family types</p>
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For PH activities: Does the MTW activity apply to all public housing developments?</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities: The MTW activity applies to all properties with project-based vouchers</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	<p>No</p>
<p>Does this MTW activity require a hardship policy?</p>	<p>No</p>
<p>Does the MTW activity require an impact analysis?</p>	<p>No</p>

Activity: C. 9.f. Increase PBV HAP Contract Length (HCV)

<p>Narrative. 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><i>Description:</i> WHHA may increase the PBV HAP contract length up to 50 years.</p> <p><i>Agency goals for MTW Activity:</i></p> <p>This waiver supports WHHA’s larger goal of using MTW flexibility to both streamline administrative processes in the PBV HAP contract length terms that can be offered for cost effectiveness and to provide greater affordability in voucher-assisted households’ income to housing cost burdens which directly impacts their long-term self-sufficiency.</p>
<p>MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>Self-Sufficiency and cost effectiveness</p>
<p>Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p>	<p>Decreased expenditures</p>
<p>Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p>	<p>The MTW activity applies to all assisted households</p>

<p>Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p>	<p>New admissions and currently assisted households</p>
<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	<p>The MTW activity applies to all family types</p>
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For PH activities: Does the MTW activity apply to all public housing developments?</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities: The MTW activity applies to all properties with project-based vouchers</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	<p>No</p>
<p>Does this MTW activity require a hardship policy?</p>	<p>No</p>
<p>Does the MTW activity require an impact analysis?</p>	<p>No</p>

Activity: C. 9.g. Increase PBV Rent to Owner	
<p>Narrative. 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><i>Description:</i></p> <p>WHHA is authorized to develop a local process to determine the initial and re-determined rent to owner. Any policy must comply with rent reasonableness, unless modified by waiver(s) 2.c. and/or 2.d.</p> <p><i>Agency goals for MTW Activity:</i></p> <p>This activity will provide households with housing choice, self-sufficiency opportunities. With limited availability and affordability of rental housing options for voucher holders / voucher-assisted households, the ability for WHHA to fully utilize the PBV program in a range of neighborhoods within our service area will expand housing choices to them that would not otherwise exist.</p>
<p>MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>Housing Choice, Self-Sufficiency</p>
<p>Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p>	<p>Increased expenditures</p>
<p>Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p>	<p>The MTW activity applies to all assisted households</p>
<p>Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p>	<p>New admissions and currently assisted households</p>
<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	<p>The MTW activity applies to all family types</p>
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For PH activities: Does the MTW activity apply to all public housing developments?</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities: The MTW activity applies to all properties with project-based vouchers</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	<p>Yes</p>
<p>Does this MTW activity require a hardship policy?</p>	<p>No</p>
<p>Does the MTW activity require an impact analysis?</p>	<p>No</p>

Activity: 9.h. Limit Portability for PBV Units (HCV)

<p>Narrative. 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><i>Description:</i></p> <p>WHHA is proposing to change the current requirement to provide a tenant-based voucher when requested by a PBV household from 12 months after PBV tenancy to 24 months. Because of the limited availability of tenant-based vouchers in our community, the number of our unassisted or waiting list households is considerable, waiting to access a tenant-based voucher – with many more in our community who are eligible, but not yet on any waitlist.</p> <p>Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:</p> <ul style="list-style-type: none"> 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. <p><i>Agency goals for MTW Activity:</i></p> <p>The goal of this activity is to reduce cost and achieve greater cost effectiveness in administrative cost expenditures as well as to increase housing choices for low-income families that are unassisted / on WHHA’s waiting list at greater rates than they otherwise would be served without this activity.</p>
<p>MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>Cost effectiveness, Housing choice</p>
<p>Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p>	<p>Decreased expenditures</p>
<p>Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p>	<p>The MTW activity applies to all assisted households</p>
<p>Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p>	<p>New admissions and currently assisted households</p>

<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	<p>The MTW activity applies to all family types</p>
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For PH activities: Does the MTW activity apply to all public housing developments?</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities: The MTW activity applies to properties with project-based vouchers</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	<p>No</p>
<p>Does this MTW activity require a hardship policy?</p>	<p>No</p>
<p>Does the MTW activity require an impact analysis?</p>	<p>No</p>

DRAFT

Activity: C. 17.c. Local, Non-Traditional Activities - Housing Development Programs

Narrative. 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.

Description:

Under this activity, WHHA may utilize MTW funding to acquire, renovate and/or build affordable housing units that meet HUD requirements for MTW "local, non-traditional housing" as defined in HUD PIH Notice 2011-45 or successor notices. WHHA may utilize this activity to provide gap financing (grants or loans) to affordable housing developments including, but not limited to: PBV developments, Low Income Housing Tax Credit developments and/or other eligible development activities, subject to approval by the WHHA’s Board of Commissioners. WHHA may also use MTW funds as gap financing to support local nonprofits in the acquisition, rehabilitation, or development of properties. MTW funds likely would be provided in the form of a loan or recoverable grant. WHHA may also use MTW funds for gap financing and to support its other owned or substantially controlled developments to leverage third-party debt in the form of tax-exempt bond financing, LIHTC equity, and other local sources. WHHA may expend MTW funds including Housing Assistance Payments and/or HCV Administrative Fee reserves on such activities if it shall not expend more than 10% of its Housing Assistance Payments budget on local, non-traditional activities including this housing development activity.

In implementing this activity, WHHA shall: 1) ensure that families assisted meet the HUD definition of "low-income"; 2) comply with PIH Notice 2011-45 as applicable; 3) comply with Section 30 of the US Housing Act of 1937; and 4) Competitively bid any MTW funding awarded through this activity to a third-party provider.

Agency goals for MTW Activity:

This activity supports the goals to increase housing choices for low-income households and to leverage additional funds for affordable housing development.

MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

Cost implications. 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

Different policy by household status/family types/sites? 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 all assisted households

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

Both new admissions and currently assisted households

Family Types. Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to only to all family types
Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV. For PH activities: Does the MTW activity apply to all public housing developments? For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	For HCV activities: The MTW activity applies to all properties with project-based vouchers.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	No
Custom Questions: Custom questions are tailored to each MTW activity.	
Does the MTW activity apply to all LNT units/properties?	The MTW activity applies to specific units/properties
Describe which LNT units/properties participate in the MTW activity?	WHHA may use MTW funds for acquisition, rehabilitation, or development of properties. WHHA may also use MTW funds to support its other owned or substantially controlled developments to leverage third-party debt in the form of tax-exempt bond financing, LIHTC equity, and other local sources. The cost implications for this activity are limited to the amount of MTW funding used to cover the financing gap on a given project.

17.c. - Housing Development Programs

For each LNT housing development that the MTW agency will commit funds to or spend funds on in this Fiscal Year, in Table 17.c.1 below please add the name of the development to one column heading and then provide the requested information, including the MTW agency role (Acquisition, Rehabilitation, or New Construction), the type of MTW agency financing (Gap Financing, Tax Credit Partnership, Other), and the total number of affordable units in the development. If possible, please provide a breakdown of the number of affordable units by level of affordability.

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	Number of Units by Affordability	Number of Units by Affordability	Number of Units by Affordability
					- 80% of AMI	- 60% of AMI	- 30% of AMI	- 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	Number of Units by Affordability	Number of Units by Affordability	Number of Units by Affordability
					- 80% of AMI	- 60% of AMI	- 30% of AMI	- 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	Number of Units by Affordability	Number of Units by Affordability	Number of Units by Affordability
					- 80% of AMI	- 60% of AMI	- 30% of AMI	- 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	Number of Units by Affordability	Number of Units by Affordability	Number of Units by Affordability
					- 80% of AMI	- 60% of AMI	- 30% of AMI	- Other

D.	Safe Harbor Waivers.
D.1	<p>Safe Harbor Waivers seeking HUD Approval: The MTW Operations Notice describes a simplified process for MTW agencies to implement MTW activities outside of the safe harbors described in Appendix I. For each Safe Harbor Waiver request, a document that includes the following information must be provided: (a) the name and number of the MTW Waiver and associated activity for which the MTW agency is seeking to expand the safe harbor, (b) the specific safe harbor and its implementing regulation, (c) the proposed MTW activity the MTW agency wishes to implement via this Safe Harbor Waiver, (d) a description of the local issue and why such an expansion is needed to implement the MTW activity, (e) an impact analysis, (f) a description of the hardship policy for the MTW activity, if applicable, and (g) 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 a Safe Harbor Waiver this year?</p> <p>No</p>
E.	Agency-Specific Waivers.
E.1	<p>Agency-Specific Waivers 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>

Custom Questions: Custom questions are tailored to each MTW activity.	
Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?	No [If no, skip to E.2]

E.2 Agency-Specific Waiver(s) for which HUD Approval has been Received:
 For each previously approved Agency-Specific Waiver(s), a set of questions will populate.

Does the MTW agency have any approved Agency-Specific Waivers?

No [If no, question set concludes]

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F. Public Housing Operating Subsidy Grant Reporting.

F.1 Please provide the public housing Operating Subsidy grant information in the table below for Operating Subsidy grants appropriated in each Federal Fiscal Year the PHA is designated an MTW PHA.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
N/A	N/A	N/A	N/A	N/A

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*
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80%-50% Area Median Income	N/A
49%-30% Area Median Income	N/A
Below 30% Area Median Income	N/A
Total Local, Non-Traditional Households	N/A

*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.
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Question	Input options and instructions
Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?	No [If Yes]: please describe the MTW agency’s plans for its future rent reform activity and the implementation timeline. [Text box] WHA will assess its MTW waiver activities and program operations after implementing its first set of waiver activities, to determine its future rent reform activities and implementation timeline.

G.3	Substantially the Same (STS) – Local, Non-Traditional.
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Questions	Input options and instructions
Please provide the total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	N/A # of unit months
Please provide the total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	N/A # of unit months
How many units, developed under the local, non-traditional housing development activity, were available for occupancy during the prior full calendar year (by bedroom size)?	Please include only those units that serve households at or below 80% of AMI in the table provided.

PROPERTY NAME/ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	# 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?
Name/Address	#	#	#	#	#	#	#	Type (below)	#	#	Y/N	\$
Name/Address	#	#	#	#	#	#	#	Type (below)	#	#	Y/N	\$
Name/Address	#	#	#	#	#	#	#	Type (below)	#	#	Y/N	\$
Totals	#	#	#	#	#	#	#		#	#		

* User will select one of the following from the “Population Type” dropdown box: General, Elderly, Disabled, Elderly/Disabled, Other

If the “Population Type” of is Other is selected, please state the Property Name/Address and describe the population type. [Text box]

** The federal accessibility standard under HUD’s Section 504 regulation is the Uniform Federal Accessibility Standards (UFAS) for purposes of Section 504 compliance. HUD recipients may alternatively use the 2010 ADA Standards for Accessible Design under Title II of the ADA, except for certain specific identified provisions, as detailed in HUD’s Notice on “Instructions for use of alternative accessibility standard,” published in the Federal Register on May 23, 2014 (“Deeming Notice”) for purposes of Section 504 compliance, <https://www.govinfo.gov/content/pkg/FR-2014-05-23/pdf/2014-11844.pdf>. This would also include adaptable units as defined by HUD’s Section 504 regulation (See 24 CFR § 8.3 and § 8.22).

G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
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In order to demonstrate that the MTW statutory requirement of “maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration” is being achieved, the MTW agency will provide information for its most recently completed Fiscal Year in the following table.

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

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

G.5	Housing Quality Standards.
	Certification is included in MTW Certifications of Compliance for HCV and local, non-traditional program. The public housing program is monitored through physical inspections performed by the Real Estate Assessment Center (REAC).

H.	Public Comments.	
H.1		Input options and instructions
	Please provide copy of all comments received by the public, Resident Advisory Board, and tenant associations.	Upload Attachment
	Please attach a narrative describing the MTW agency’s analysis of the comments and any decisions made based on these comments.	Upload Attachment
	If applicable, was an additional public hearing held for an Agency-Specific Waiver and/or Safe Harbor waiver?	Yes
	If yes, please attach the comments received along with the MTW agency’s description of how comments were considered.	Upload Attachment

I	Evaluations.	
I.1	Please list any ongoing and completed evaluations of the MTW agency’s MTW policies, that the PHA is aware of, including the information requested in the table below. In the box “title and short description,” please write the title of the evaluation and a brief description of the focus of the evaluation.	
Question		Input options and instructions
	Does the PHA have an agency-sponsored evaluation?	No

Table I.1 - Evaluations of MTW Policies

Title and short description	Evaluator name and contact information	Time period	Reports available

J	MTW Certifications of Compliance.	
J.1	The MTW agency must execute the MTW Certifications of Compliance form and submit as part of the MTW Supplement submission to HUD. Certification is provided below.	