



# FY2025 Moving to Work Supplement Amendment

BERKELEY HOUSING AUTHORITY

JULY 2024 - JUNE 2025

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## A. PHA Information

<b>A.1</b>	<b>PHA Name</b>	Berkeley Housing Authority
	<b>PHA Code</b>	CA058
	<b>MTW Supplement for PHA Fiscal Year Beginning</b>	07/01/2024
	<b>PHA Program Type</b>	HCV Only
	<b>MTW Cohort Number</b>	4 – Landlord Incentives
	<b>MTW Supplement Submission Type</b>	Amended Annual Submission

## B. Narrative

- B.1** Established in 1966, the Berkeley Housing Authority provides rental assistance to approximately 2,050 low-income household units through the Housing Choice Voucher (HCV), Project-Based Voucher (PBV), Project Move-Up via Moderate Rehabilitation (Mod-Rehab), Emergency Housing Voucher (EHV), Single Room Occupancy (SRO), Mainstream Voucher, and Veterans Affairs Supportive Housing (VASH) programs without regard to race, ethnicity, religion, family status, national origin, gender, sexual orientation or disability status. It is the mission of the Berkeley Housing Authority to (1) enable our clients to become self-sufficient and economically independent through delivery of housing assistance and other related services; (2) enable elderly and disabled individuals to achieve economic independence and self-sufficiency and to live independently within their economic resources; (3) encourage short-term reliance on housing assistance for able-bodied family members by promoting economic independence and self-sufficiency participation in education, training or job development activities designed to lead to self-sufficiency in return for the housing assistance, and (4) require personal responsibility for the economic consequences of family decisions. Our Core Values are to be responsible stewards of the resources available to the Authority; seek ways to respond to the unique needs of our clients, within the constraints of all applicable program rules and regulations, and to value the talents and gifts of our customers, prospective customers, and our staff within our respective roles.

## C. MTW Waivers and Associated Activities

### ACTIVITY 1 2.j. Alternative Utility Allowance (HCV)

#### CORE QUESTIONS

1. **Fiscal Year Introduced**  
2023
2. **Fiscal Year Approved**  
2024
3. **Status**  
Not implemented
4. **Narrative**  
The BHA will streamline its recertifications by employing a standard utility allowance for its HCV households. This act will reduce staff hours, allowing staff to focus on other matters. Additionally, it will allow the household rent/portion to increase helping households to realize a more market rate rent.
5. **MTW Statutory Objectives**  
Cost effectiveness
6. **Cost Implications**  
Increased revenue  
Decreased expenditures
7. **Policy by Household Status/Family Types/Sites**  
The MTW activity applies to all assisted households
8. **Household Status**  
New admissions and currently assisted households
9. **Family Types**  
The MTW activity applies to all family types
10. **Location**  
**For HCV Activities:**
  1. The MTW activity applies to all tenant-based units
  2. The MTW activity applies to all properties with project-based vouchers
11. **Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**  
No
12. **Does this MTW activity require a hardship policy?**  
No
13. **Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
No
14. **Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**  
No

15. **How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?**  
N/A
16. **Does the MTW activity require an impact analysis?**  
No
17. **Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
No
18. **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 BHA recently received approval to implement this waiver. The BHA anticipates the waiver being implemented in the 3<sup>rd</sup> quarter of 2024.
19. **Please provide an explanation as to why the activity was discontinued or will be discontinued.**  
N/A

## CUSTOM QUESTIONS

1. **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.**

Utility allowances, using the standard method, are the deduction of individual utilities based on bedroom size and dwelling type from a household's Total Tenant Payment (TTP). The BHA will make a standardized utility allowance by averaging every utility type and then adding those averages together based on bedroom size and dwelling type:

1. Row House/Townhouse, Semi-Detached/Duplex, Triplex, and Fourplex
2. Detached House - Single Family Residence
3. Apartments - 5 or more units

This will result in a single utility allowance amount, based on bedroom size and dwelling type, that will be deducted from a household's TTP. The BHA will have three standard utility allowance schedules based on bedroom size and dwelling type for HCV. This new practice will reduce the administrative burden on the BHA's staff during recertifications.

## ACTIVITY 2 2.n. Utility Reimbursements (HCV)

### CORE QUESTIONS

**1. Fiscal Year Introduced**

2023

**2. Fiscal Year Approved**

2024

**3. Status**

Not implemented

**4. Narrative**

The BHA will eliminate the utility reimbursements. The goal is to increase revenue for the authority while making households more self-reliant.

The BHA disburses \$3,945 in monthly utility reimbursements to approximately 68 HCV households, which equates to an average monthly utility reimbursement of \$58 per household. The yearly average reimbursement is \$696 per household. There are approximately 68 households that pay \$0 in rent due to their utility reimbursement. Once this activity takes effect, these households must pay at least the minimum rent of \$50 regardless of their utility allowance. The BHA will realize a minimum of \$3,945 in monthly cost savings and \$3,400 in monthly decreased Housing Assistance Payments. The BHA anticipates at least a \$88,140 cost savings during the first year in which this activity is implemented.

**5. MTW Statutory Objectives**

Cost effectiveness

**6. Cost Implications**

Increased revenue

Decreased expenditures

**7. Policy by Household Status/Family Types/Sites**

The MTW activity applies to all assisted households

**8. Household Status**

New admissions and currently assisted households

**9. Family Types**

The MTW activity applies to all family types

**10. Location**

**For HCV Activities:** 1. The MTW activity applies to all tenant-based units

2. The MTW activity applies to all properties with project-based vouchers

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

No

**12. Does this MTW activity require a hardship policy?**

No

**13. Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**

No

- 14. Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**  
No
- 15. How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?**  
N/A
- 16. Does the MTW activity require an impact analysis?**  
No
- 17. Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
No
- 18. 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 BHA recently received approval to implement this waiver. The BHA anticipates the waiver being implemented in the 3<sup>rd</sup> quarter of 2024.
- 19. Please provide an explanation as to why the activity was discontinued or will be discontinued.**  
N/A

## ACTIVITY 3 10.a. Waive Operating a Required FSS Program (HCV)

### CORE QUESTIONS

- 1. Fiscal Year Introduced**  
2025, through a supplement amendment
- 2. Fiscal Year Approved**  
Pending
- 3. Status**  
N/A
- 4. Narrative**  
Due to budget constraints, the BHA is eliminating the Family Self-Sufficiency (FSS) program. Currently, there are no active participants on BHA's FSS program.
- 5. MTW Statutory Objectives**  
Cost effectiveness
- 6. Cost Implications**  
Decreased expenditures
- 7. Policy by Household Status/Family Types/Sites**  
The MTW activity applies to all assisted households
- 8. Household Status**  
New admissions and currently assisted households
- 9. Family Types**  
The MTW activity applies to all family types
- 10. Location**  
**For HCV Activities:**
  1. The MTW activity applies to all tenant-based units
  2. The MTW activity applies to all properties with project-based vouchers
- 11. Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**  
No
- 12. Does this MTW activity require a hardship policy?**  
No, the BHA does not require FSS program participation as a condition for housing subsidy.
- 13. Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
N/A
- 14. Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**  
N/A
- 15. How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?**  
N/A

**16. Does the MTW activity require an impact analysis?**

No, the BHA does not require FSS program participation as a condition for housing subsidy.

**17. Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**

N/A

**18. 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

**19. Please provide an explanation as to why the activity was discontinued or will be discontinued.**

N/A

## ACTIVITY 4 2.b. Payment Standards –Fair Market Rents (HCV)

### CORE QUESTIONS

**1. Fiscal Year Introduced**

2023

**2. Fiscal Year Approved**

2024

**3. Status**

Not implemented

**4. Narrative**

The BHA will raise the payment standard to 120% of the Fair Market Rents (FMR) for Project-Based Vouchers (PBV), Mainstream Vouchers, and Foster Youth to Independence Vouchers (FYI). Through a safe harbor waiver, the BHA will raise the payment standard to 150% of the FMR for Tenant-Based Vouchers (TBV). Housing choices are dwindling due to increased local market rents, and this restricts where BHA households can live. This activity is a remedy to that concern.

The current BHA payment standard for PBV, Mainstream, and FYI is 110% of the FMR. A payment standard of 120% of the FMR will increase the payment standard by an average of \$236 for all bedroom sizes.

The current BHA payment standard for TBV is 120% of the FMR. A payment standard of 150% of FMR will increase the payment standard by an average of \$707 for all bedroom sizes. Raising the payment standard to 150% of the FMR is outside of the safe harbor and will, therefore, constitute a Safe Harbor waiver.

California has the highest homeless population in the United States. 27.89% of the total homeless population in the United States lives in California. Housing rents are inflated everywhere, especially in California. Finding decent, quality, and affordable housing in California is a difficult task for anyone, including market-rate renters. The pool of housing for low-income and affordable households is even shallower. In order for the BHA to compete with market forces, it must increase its payment standard. If the BHA is unable to raise its payment standard, it will result in fewer housing options for the city's most vulnerable populations, which could ultimately lead to more homelessness.

**5. MTW Statutory Objectives**

Housing choice

**6. Cost Implications**

Increased expenditures

**7. Policy by Household Status/Family Types/Sites**

The MTW activity applies to all assisted households

**8. Household Status**

New admissions and currently assisted households

**9. Family Types**

The MTW activity applies to all family types

**10. Location**

**For HCV Activities:**

1. The MTW activity applies to all tenant-based units
2. The MTW activity applies to all properties with project-based vouchers

11. **Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**  
No
12. **Does this MTW activity require a hardship policy?**  
Yes
13. **Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
Yes, Alternative Recertification Schedule For Households
14. **Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**  
No
15. **How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?**  
N/A
16. **Does the MTW activity require an impact analysis?**  
Yes
17. **Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
No
18. **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 BHA recently received approval to implement this waiver. The BHA anticipates the waiver being implemented in the 3<sup>rd</sup> quarter of 2024.
19. **Please provide an explanation as to why the activity was discontinued or will be discontinued.**  
N/A
20. **Statue or Regulation Waived**  
Certain provisions of section 8(o)(1)(B) and 8(o)(13)(H) of the 1937 Act and 24 CFR 982.503-505 and 983.301

## CUSTOM QUESTIONS

1. **Please explain the payment standards by ZIP code or “grouped” ZIP codes.**

The current BHA PBV, Mainstream, and FYI payment standard is 110% of the FMR. A payment standard of 120% of the FMR will increase the payment standard by an average of \$236 for all bedroom sizes.

Bedroom Size	Current FMR	Current PS	120% FMR-PS
SRO	\$1,243	\$1,367	\$1491
0	\$1,658	\$1,823	\$1,989
1	\$1,969	\$2,165	\$2,362
2	\$2,405	\$2,645	\$2,886
3	\$3,144	\$3,458	\$3,772
4	\$3,706	\$4,076	\$4,447

The current BHA TBV payment standard is 120% of the FMR. A payment standard of 150% of FMR will increase the payment standard by an average of \$707 for all bedroom sizes.

Bedroom Size	Current FMR	Current PS	150% FMR-PS
SRO	\$1,243	\$1491	\$1,865
0	\$1,658	\$1,989	\$2,487
1	\$1,969	\$2,362	\$2,954
2	\$2,405	\$2,886	\$3,608
3	\$3,144	\$3,772	\$4,716
4	\$3,706	\$4,447	\$5,559

## IMPACT ANALYSIS

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

The BHA will raise the payment standard to 120% of the Fair Market Rents (FMR) for Project-Based Vouchers (PBV), Mainstream Vouchers, and Foster Youth to Independence Vouchers (FYI). Through a safe harbor waiver, the BHA will raise the payment standard to 150% of the FMR for Tenant-Based Vouchers (TBV). It is anticipated that this activity will increase the BHA’s federal expenditures in terms of housing assistance payments (HAP). The average HAP is projected to increase by \$236 per family, per month for PB, Mainstream, and FYI vouchers, and the average HAP is projected to increase by \$707 per family, per month for TBV. Augmenting the payment standard for FMR will expand housing choices for families and deconcentrate poverty.
- 2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)**

Families will, similarly, see an increase in their tenant rent portion. Due to increases in local market rents, all families will see an increase in rent regardless of their income status.
- 3. Impact on the agency’s waitlist(s) (e.g., any change in the amount of time families are on the waitlist)**

This activity will not affect the waiting list.
- 4. Impact on the agency’s termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)**

This activity will not affect the termination rate of families.
- 5. Impact on the agency’s current occupancy level in public housing and utilization rate in the HCV program**

Due to an increase in HAP, this activity may affect the agency’s current utilization rate in the HCV program. It is the expectation that this activity will have a neutral effect on the HCV utilization rate when combined and implemented with the other BHA MTW activities.
- 6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice**  
*MTW Statutory Objective – Housing Choice*

This activity will enlarge the pool of available and affordable housing choices from which a family can choose.
- 7. Impact on the agency’s ability to meet the MTW statutory requirements**

The BHA will be able to meet the statutory objective of Housing Choice.
- 8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity**

The BHA does not expect to see an increase in hardship requests as a result of this activity.
- 9. Across the other factors above, the impact on protected classes (and any associated disparate impact)**

This activity is based on income reviews, in which protected class is not a factor, and there is no anticipated impact on protected classes. Elderly and disabled participants are a protected class; however, this activity will not have a negative impact on them.

## ACTIVITY 5 3.b. Alternative Recertification Schedule For Households (HCV)

### CORE QUESTIONS

**1. Fiscal Year Introduced**

2023

**2. Fiscal Year Approved**

2024

**3. Status**

Not implemented

**4. Narrative**

The BHA will decrease the frequency of tenant reexaminations from annual to triennial for all HCV households. This restructuring will allow families to have a more consistent rent portion over a longer period of time, and it will create more time for the BHA staff to attend to other business affairs. On the off years, when tenants are not required to complete a full reexamination, tenants will be required to complete a brief check-in with the BHA.

Interim recertifications will be limited to one interim per year at the request of the household. If the interim is for a decrease in income, only income decreases of 10% or more will be processed. Interim decreases will be limited to one during a calendar year and no interim decreases during the first six months after initial occupancy. Required interim recertifications for household composition changes, landlord rent increases, and Family Self-Sufficiency will not count against the limit on voluntary interim recertifications.

**5. MTW Statutory Objectives**

Cost effectiveness  
Self-sufficiency

**6. Cost implications**

Decreased expenditures

**7. Policy by household status/family types/sites**

The MTW activity applies to all assisted households

**8. Household Status**

New admissions and currently assisted households

**9. Family Types**

The MTW activity applies to all family types

**10. Location**

**For HCV Activities:**

1. The MTW activity applies to all tenant-based units
2. The MTW activity applies to all properties with project-based vouchers

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

No

**12. Does this MTW activity require a hardship policy?**

Yes

- 13. Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
Yes, Payment Standards – Fair Market Rents
- 14. Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**  
No
- 15. How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?**  
N/A
- 16. Does the MTW activity require an impact analysis?**  
Yes
- 17. Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
No
- 18. 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 BHA recently received approval to implement this waiver. The BHA anticipates the waiver being implemented in the 3<sup>rd</sup> quarter of 2024.
- 19. Please provide an explanation as to why the activity was discontinued or will be discontinued.**  
N/A

## CUSTOM QUESTIONS

- 1. What is the recertification schedule?**  
Once every three years
- 2. How many interim recertifications per year may a household request?**  
1
- 3. Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.**  
Required interim recertifications for household composition changes or landlord rent increases will not count against the limit on voluntary interim recertifications.

## IMPACT ANALYSIS

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

The BHA will decrease the frequency of tenant reexaminations from annual to triennial for all of its HCV households. The BHA predicts that this activity will produce operational cost savings, as staff are freed to manage other administrative affairs.

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

This activity will allow the BHA's households to have a more consistent tenant rent portion over a longer period of time, which will consequently make the HCV programs more affordable for families.

**3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)**

This activity will not affect the waiting list.

**4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)**

This activity will not affect the termination rate of families.

**5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program**

This activity will not affect the agency's current utilization rate in the HCV program.

**6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice**

*MTW Statutory Objective - Cost Effectiveness*

This activity will decrease the administrative costs associated with processing annual and interim recertifications.

*MTW Statutory Objective – Self-Sufficiency*

This activity will incentivize participants to increase their income, knowing they may do so without the penalty of an increased tenant rent portion, thus propelling them towards a more self-sustained state.

**7. Impact on the agency's ability to meet the MTW statutory requirements**

The BHA will be able to meet the statutory objective of Cost Effectiveness.

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

The BHA does not expect to see an increase in hardship requests as a result of this activity.

**9. Across the other factors above, the impact on protected classes (and any associated disparate impact)**

This activity is based on income reviews, in which protected class is not a factor, and there is no anticipated impact on protected classes.

## ACTIVITY 6 3.d. Self-Certification of Assets (HCV)

### CORE QUESTIONS

1. **Fiscal Year Introduced**  
2023
2. **Fiscal Year Approved**  
2024
3. **Status**  
Not implemented
4. **Narrative**  
The asset self-certification ceiling will be increased from \$5,000 to \$50,000. This will lessen the regulatory responsibilities of the BHA.
5. **MTW Statutory Objectives**  
Cost Effectiveness
6. **Cost Implications**  
Decreased expenditures
7. **Policy by Household Status/Family Types/Sites**  
The MTW activity applies to all assisted households
8. **Household Status**  
New admissions and currently assisted households
9. **Family Types**  
The MTW activity applies to all family types
10. **Location**  
**For HCV Activities:**
  1. The MTW activity applies to all tenant-based units
  2. The MTW activity applies to all properties with project-based vouchers
11. **Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**  
No
12. **Does this MTW activity require a hardship policy?**  
No
13. **Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
No
14. **Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**  
No
15. **How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?**  
N/A

**16. Does the MTW activity require an impact analysis?**

No

**17. Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**

No

**18. 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 BHA recently received approval to implement this waiver. The BHA anticipates the waiver being implemented in the 3<sup>rd</sup> quarter of 2024.

**19. Please provide an explanation as to why the activity was discontinued or will be discontinued.**

N/A

## CUSTOM QUESTIONS

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

\$50,000

## ACTIVITY 7 4.a. Vacancy Loss (HCV)

### CORE QUESTIONS

1. **Fiscal Year Introduced**  
2024
2. **Fiscal Year Approved**  
2024
3. **Status**  
Not implemented
4. **Narrative**  
To retain qualified landlords, the BHA will offer an incentive to landlords when a current tenant dies, while occupying the unit, of one (1) month of rent, as long as the landlord agrees to rent the unit to another HCV participant. The landlord will receive the incentive upon leasing to another HCV tenant and executing the HAP contract and Tenancy Addendum with the BHA.
5. **MTW Statutory Objectives**  
Housing choice
6. **Cost Implications**  
Increased expenditures
7. **Policy by Household Status/Family Types/Sites**  
The MTW activity applies to all assisted households
8. **Household Status**  
New admissions and currently assisted households
9. **Family Types**  
The MTW activity applies to all family types
10. **Location**  
**For HCV Activities:**
  1. The MTW activity applies to all tenant-based units
  2. The MTW activity applies to all properties with project-based vouchers
11. **Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**  
No
12. **Does this MTW activity require a hardship policy?**  
No
13. **Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
No
14. **Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**  
No
15. **How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?**  
N/A

16. **Does the MTW activity require an impact analysis?**  
No
17. **Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
No
18. **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 BHA recently received approval to implement this waiver. The BHA anticipates the waiver being implemented in the 3<sup>rd</sup> quarter of 2024.
19. **Please provide an explanation as to why the activity was discontinued or will be discontinued.**  
N/A

## CUSTOM QUESTIONS

1. **Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program)?**  
To all units
2. **What is the maximum payment that can be made to a landlord under this policy?**  
One month of contract rent
3. **How many payments were issued under this policy in the most recently completed PHA fiscal year?**  
N/A
4. **What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?**  
N/A

## ACTIVITY 8 4.c. Other Landlord Incentives (HCV)

### CORE QUESTIONS

**1. Fiscal Year Introduced**

2023

**2. Fiscal Year Approved**

2024

**3. Status**

Implemented

**4. Narrative**

To attract and retain qualified landlords, the BHA has already implemented a landlord incentive of up to \$1,500 in Unit Turnover Program funds to cover expenses to ready a vacant unit for lease up in the Housing Choice Voucher Program. Project-based, Moderate Rehab, Below Market Rate properties, and new luxury developments landlords are not eligible to apply for the incentive. Landlords will receive the incentive upon leasing to another HCV tenant (after an approved Request for Tenancy Approval and initial inspection).

As a member of the Landlord Incentives cohort, the BHA desires to document incentives already undertaken prior to acceptance into the MTW program for research purposes.

**5. MTW Statutory Objectives**

Housing choice

**6. Cost Implications**

Increased expenditures

**7. Policy by Household Status/Family Types/Sites**

The MTW activity applies to all assisted households

**8. Household Status**

New admissions and currently assisted households

**9. Family Types**

The MTW activity applies to all family types

**10. Location**

**For HCV Activities:**

1. The MTW activity applies to all tenant-based units
2. The MTW activity applies to all properties with project-based vouchers

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

No

**12. Does this MTW activity require a hardship policy?**

No

**13. Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**

No

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

No

15. **How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?**  
None
16. **Does the MTW activity require an impact analysis?**  
No
17. **Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
No
18. **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.**  
BHA has successfully used this waiver to retain eight landlords.
19. **Please provide an explanation as to why the activity was discontinued or will be discontinued.**  
N/A

## CUSTOM QUESTIONS

1. **Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program)?**  
To all units
2. **What is the maximum payment that can be made to a landlord under this policy?**  
\$1,500
3. **How many payments were issued under this policy in the most recently completed PHA fiscal year?**  
8
4. **What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?**  
\$12,000

## ACTIVITY 9 5.a. Pre-Qualifying Unit Inspections (HCV)

### CORE QUESTIONS

**1. Fiscal Year Introduced**

2023

**2. Fiscal Year Approved**

2024

**3. Status**

Not implemented

**4. Narrative**

To attract and incentivize qualified landlords to participate in the HCV program, the BHA will allow vacant units to be pre-inspected prior to occupancy. The pre-inspection will be conducted within 90 days of a participant occupying the unit, HQS inspection standards, as found at 24 CFR 982.401, will not be altered, and all participants will be able to request an interim inspection.

**5. MTW Statutory Objectives**

Housing choice

**6. Cost Implications**

Neutral

**7. Policy by Household Status/Family Types/Sites**

The MTW activity applies to all assisted households

**8. Household Status**

New admissions and currently assisted households

**9. Family Types**

The MTW activity applies to all family types

**10. Location**

**For HCV Activities:**

1. The MTW activity applies to all tenant-based units
2. The MTW activity applies to all properties with project-based vouchers

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

No

**12. Does this MTW activity require a hardship policy?**

No

**13. Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**

No

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

No

**15. How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?**

N/A

**16. Does the MTW activity require an impact analysis?**

No

**17. Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**

No

**18. 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 BHA recently received approval to implement this waiver. The BHA anticipates the waiver being implemented in the 3<sup>rd</sup> quarter of 2024.

**19. Please provide an explanation as to why the activity was discontinued or will be discontinued.**

N/A

## CUSTOM QUESTIONS

**1. How long is the pre-inspection valid for?**

90 days

## ACTIVITY 10 5.d. Alternative Inspection Schedule (HCV)

### CORE QUESTIONS

**1. Fiscal Year Introduced**

2023

**2. Fiscal Year Approved**

2024

**3. Status**

Implemented

**4. Narrative**

Under Notice PIH 2016-05, the BHA has already instituted qualified biennial inspections, meaning annual inspections that pass on their first attempt will skip a year before the next annual HQS inspection, and annual inspections that fail on their first attempt will have an annual HQS inspection the following year. Landlords and program participants will continue to be able to request a Special Inspection at any time, whether the unit passes or fails the first attempt of the most recent HQS inspection. BHA reserves the right to accept inspections performed by another entity (city, housing developers in conformity with HOME or LIHTC rules) in lieu of conducting an annual inspection, but at this time will continue to schedule annual inspections to be conducted by BHA's contract inspector.

As a member of the Landlord Incentives cohort, the BHA desires to document incentives already undertaken prior to acceptance into the MTW program for research purposes.

**5. MTW Statutory Objectives**

Cost effectiveness

**6. Cost Implications**

Increased revenue

Decreased expenditures

**7. Policy by Household Status/Family Types/Sites**

The MTW activity applies to all assisted households

**8. Household Status**

New admissions and currently assisted households

**9. Family Types**

The MTW activity applies to all family types

**10. Location**

**For HCV Activities:** The MTW activity applies to all tenant-based units

The MTW activity applies to all properties with project-based vouchers

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

No

**12. Does this MTW activity require a hardship policy?**

No

- 13. Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
No
- 14. Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**  
No
- 15. How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?**  
None
- 16. Does the MTW activity require an impact analysis?**  
No
- 17. Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
No
- 18. 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.**  
BHA is actively conducting biennial inspections without any issues to participants or landlords.
- 19. Please provide an explanation as to why the activity was discontinued or will be discontinued.**  
N/A

## D. Safe Harbor Waivers

### D.1 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.

Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?

No

## E. Agency-Specific Waivers

### E.1 Agency-Specific Waivers for HUD Approval:

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.

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.

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.

Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?

No

### 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

## 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
2021				9/30/2029
2022				9/30/2030
2023				09/30/2031
2024				09/30/2032

## G. MTW Statutory Requirements

### G.1 75% Very Low Income – Local, Non-Traditional.

HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non- Traditional program households.

Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income	0
49%-30% Area Median Income	0
Below 30% Area Median Income	0
<b>Total Local, Non-Traditional Households</b>	<b>0</b>

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

### G.2 Establishing Reasonable Rent Policy

**Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?**

Yes. The BHA will eliminate utility reimbursements and implement a standard utility allowance.

### G.3 Substantially the Same (STS) – Local, Non-Traditional

**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.**

0 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.**

0 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?
	0	0	0	0	0	0	0		0	0		

\* 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

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	0
2 Person	0
3 Person	0
4 Person	0
5 Person	0
6+ Person	0
<b>Totals</b>	<b>0</b>

#### 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 Please provide copy of all comments received by the public, Resident Advisory Board, and tenant associations.**

Attached

**Please attach a narrative describing the MTW agency's analysis of the comments and any decisions made based on these comments.**

Attached

If applicable, was an additional public hearing held for an Agency-Specific Waiver and/or Safe Harbor waiver?

Yes

No

N/A

**If yes, please attach the comments received along with the MTW agency's description of how comments were considered.**

Attached

## 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.

**Does the PHA have an agency-sponsored evaluation?**

No

**Table I.1 – Evaluation 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.



Activity Organizer								
Activity #	MTW Waiver	Core Questions	Custom Questions	Safe Harbor	Impact Analysis	Hardship Policy	FY Intro	FY Approved
<b>1. Tenant Rent Policies</b>								
1	j. Alternative Utility Allowance (HCV)	X	X	X			2023	2024
2	n. Utility Reimbursements (PH & HCV)	X					2023	2024
<b>2. Payment Standards and Rent Reasonableness</b>								
4	b. Payment Standards - Fair Market Rents (HCV) 120% for PBV	X	X	X	X	X	2023	2024
<b>3. Reexaminations</b>								
5	b. Alternative Reexamination Schedule for Households (HCV)	X	X	X	X	X	2023	2024
6	d. Self-Certification of Assets (HCV)	X	X	X			2023	2024
<b>4. Landlord Leasing Incentives</b>								
7	a. Vacancy Loss (HCV)	X	X	X			2023	2024
8	c. Other Landlord Incentives (HCV)	X	X	X			2023	2024
<b>5. Housing Quality Standards (HQS)</b>								
9	a. Pre-Qualifying Unit Inspections (HCV)	X	X	X			2023	2024
10	d. Alternative Inspection Schedule (HCV)	X		X			2023	2024
<b>10. FSS Program With MTW Flexibility Activities</b>								
3	10.a. Waive Operating a Required FSS Program (HCV)	X	X				2025	Pending
Activity #	Agency Specific Waiver	Core Questions	Custom Questions	Safe Harbor	Impact Analysis	Hardship Policy	FY Intro	FY Approved
4	b. Payment Standards - Fair Market Rents (HCV) 150% for TBV	X	X	X	X	X	2023	2024
<b>History</b>								
Time	Activity Affected					Change		
2024	Activity 3 - Eliminate Earned Income Disregard (HCV)					Proposed activity eliminated		

## **Hardship Policy**

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

### **Applicable Family Situations**

Qualifying hardships include the following:

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

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

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

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

### **Resident and Participant Notification**

The BHA will notify families of its Hardship Policy through its Administrative Plan, at intake, at recertification, and when a family is to be terminated due to an MTW activity.

### **Grievance Procedure**

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

### **Reasonable Accommodations**

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

### **Record Keeping**

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