



**Berkeley Housing Authority**

1947 Center St, 5<sup>th</sup> Fl, Berkeley, CA 94704  
Telephone: (510) 981 5470 Fax: (510) 981 5480

*Office of the Executive Director*

Item 6A  
NEW BUSINESS  
May 11, 2023

To: Honorable Chairperson and Members of the Housing Authority Commission

From: Shara Jones

Subject: Presentation and Discussion About the MTW Supplement Plan

Attachment: MTW Supplemental Plan

APRIL 2023



FY23

# MOVING TO WORK SUPPLEMENT

BERKELEY HOUSING AUTHORITY

# Berkeley Housing Authority

## FY23 Moving to Work Supplement

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<b>A.</b>	<b>PHA Information.</b>
<b>A.1</b>	<p><b>PHA Name:</b> Berkeley Housing Authority  <b>PHA Code:</b> CA058  <b>MTW Supplement for PHA Fiscal Year Beginning:</b> (MM/DD/YYYY): 07/01/2022  <b>PHA Program Type:</b> Public Housing (PH) only    <input checked="" type="checkbox"/> Housing Choice Voucher (HCV) only    Combined  <b>MTW Cohort Number:</b> 1  <b>MTW Supplement Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission</p>
<b>B.</b>	<b>Narrative.</b>
<b>B.1</b>	<p><b>MTW Supplement Narrative.</b></p> <p>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.</p>

**BHA ACTIVITY 1**  
**Alternative Utility Allowance (HCV)**

Core Question/Comment	Answer
<b>Narrative.</b> 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.	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.
<b>MTW Statutory Objectives.</b> Which of the MTW statutory objectives does this MTW activity serve?	Cost effectiveness
<b>Cost implications.</b> What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.	Increased revenue Decreased expenditures
<b>Different policy by household status/family types/sites?</b> Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?	The MTW activity applies to all assisted households
<b>Household Status.</b> 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
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types
<b>Location.</b> 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.	<b>For HCV activities:</b> 1. The MTW activity applies to all tenant-based units 2. 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 hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)	No
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?	No
How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?	N/A
Does the MTW activity require an impact analysis?	No
Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)	No
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
Please provide an explanation as to why the activity was discontinued or will be discontinued.	N/A

1.i., 1.j. - Alternative Utility Allowance (PH & HCV)	Input options and instructions
<p>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.</p>	<p>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:</p> <ol style="list-style-type: none"> <li>1. Row House/Townhouse, Semi-Detached/Duplex, Triplex, and Fourplex</li> <li>2. Detached House - Single Family Residence</li> <li>3. Apartments - 5 or more units</li> </ol> <p>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.</p>

## BHA ACTIVITY 2

### Elimination of Utility Reimbursement (HCV)

Core Question/Comment	Answer
<p><b>Narrative.</b> 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>The BHA will eliminate the utility reimbursements. The goal is to increase revenue for the authority while making households more self-reliant.</p> <p>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.</p>
<p><b>MTW Statutory Objectives.</b> Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>Cost effectiveness</p>
<p><b>Cost implications.</b> 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 revenue Decreased expenditures</p>
<p><b>Different policy by household status/family types/sites?</b> 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><b>Household Status.</b> 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><b>Family Types.</b> 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><b>Location.</b> 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><b>For HCV activities:</b></p> <ol style="list-style-type: none"> <li>1. The MTW activity applies to all tenant-based units</li> <li>2. The MTW activity applies to all properties with project-based vouchers</li> </ol>
<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 hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</p>	<p>No</p>
<p>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</p>	<p>No</p>
<p>How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?</p>	<p>N/A</p>
<p>Does the MTW activity require an impact analysis?</p>	<p>No</p>
<p>Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)</p>	<p>No</p>
<p>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.</p>	<p>N/A</p>
<p>Please provide an explanation as to why the activity was discontinued or will be discontinued.</p>	<p>N/A</p>

### BHA ACTIVITY 3

#### Eliminate Earned Income Disregard (HCV)

Core Question/Comment	Answer
<p><b>Narrative.</b> 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>The BHA will eliminate the Earned Income Disregard. This will increase operational efficiencies by reducing the time it takes to administratively process the EID.</p> <p>Currently, the EID allows individuals who go from not working in the previous 12 months, to working, to gradually phase in the income counted toward their rental calculation over a period of 2 years. The EID is an opportunity for clients that gain earned income, that did not previously have earned income, to experience the benefit of increased income without that income increase being utilized for rent immediately; however, due to cumbersome regulations, the cost to continue offering this exclusion far outweigh the benefits. Families will benefit from an increase in income without an immediate increase in rent.</p>
<p><b>MTW Statutory Objectives.</b> Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>Cost effectiveness Self-sufficiency</p>
<p><b>Cost implications.</b> 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><b>Different policy by household status/family types/sites?</b> 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 only to a subset or subsets of assisted households</p>
<p><b>Household Status.</b> 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><b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?</p>	<p><b>The MTW activity applies only to selected family types</b> Disabled families (to the extent those families are not exempt via a reasonable accommodation)</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><b>For HCV activities:</b></p> <ol style="list-style-type: none"> <li>1. The MTW activity applies to all tenant-based units</li> <li>2. The MTW activity applies to all properties with project-based vouchers</li> </ol>
<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 hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</p>	<p>No</p>
<p>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</p>	<p>No</p>
<p>How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?</p>	<p>N/A</p>
<p>Does the MTW activity require an impact analysis?</p>	<p>No</p>
<p>Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)</p>	<p>No</p>
<p>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.</p>	<p>N/A</p>
<p>Please provide an explanation as to why the activity was discontinued or will be discontinued.</p>	<p>N/A</p>



1.v., 1.w. - Alternative Income Inclusions/Exclusions (PH & HCV)	Input options and instructions
What inclusions or exclusions will be eliminated, modified, or added?	The BHA will eliminate the Earned Income Disregard.

## BHA ACTIVITY 4

### Payment Standards - Fair Market Rents (HCV)

Core Question/Comment	Answer
<p><b>Narrative.</b> 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>The BHA will raise the payment standard to 120% of the Fair Market Rents (FMR) for Project-Based Vouchers (PBV) and to 150% for Tenant-Based Vouchers (TBV). Housing choices are dwindling due to growing local market rents, and this limits where BHA households can live. This activity is a remedy to this concern.</p> <p>The current BHA payment standard for PBV is 110% of the FMR. A payment standard of 120% of FMR will increase the payment standard by an average of \$236 for all bedroom sizes.</p> <p>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.</p>
<p><b>MTW Statutory Objectives.</b> Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>Housing choice</p>
<p><b>Cost implications.</b> 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><b>Different policy by household status/family types/sites?</b> 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><b>Household Status.</b> 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><b>Family Types.</b> 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><b>Location.</b> 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><b>For HCV activities:</b></p> <ol style="list-style-type: none"> <li>1. The MTW activity applies to all tenant-based units</li> <li>2. The MTW activity applies to all properties with project-based vouchers</li> </ol>
<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>Yes</p>
<p>Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</p>	<p>Yes, Alternative Reexamination Schedule for Households</p>
<p>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</p>	<p>N/A</p>
<p>How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?</p>	<p>N/A</p>
<p>Does the MTW activity require an impact analysis?</p>	<p>Yes</p>
<p>Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)</p>	<p>No</p>
<p>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.</p>	<p>N/A</p>
<p>Please provide an explanation as to why the activity was discontinued or will be discontinued.</p>	<p>N/A</p>

**2.b. – Payment Standards – Fair Market Rents (HCV)****Input options and instructions**

Please explain the payment standards by FMR.

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

<b>Bedroom Size</b>	<b>Current FMR</b>	<b>Current PS</b>	<b>120% FMR-PS</b>
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.

<b>Bedroom Size</b>	<b>Current FMR</b>	<b>Current PS</b>	<b>150% FMR-PS</b>
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

**FY23 BHA Impact Analysis Activity**  
**Payment Standard – Fair Market Rents**

**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), and the BHA will raise the payment standard to 150% of the Fair Market Rents (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 PBV, 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.

## BHA ACTIVITY 5

### Alternative Recertification Schedule For Households (HCV)

Core Question/Comment	Answer
<p><b>Narrative.</b> 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>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.</p> <p>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.</p>
<p><b>MTW Statutory Objectives.</b> Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>Cost effectiveness Self-sufficiency</p>
<p><b>Cost implications.</b> 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><b>Different policy by household status/family types/sites?</b> 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><b>Household Status.</b> 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><b>Family Types.</b> 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><b>Location.</b> 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><b>For HCV activities:</b></p> <ol style="list-style-type: none"> <li>1. The MTW activity applies to all tenant-based units</li> <li>2. The MTW activity applies to all properties with project-based vouchers</li> </ol>
<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>Yes</p>
<p>Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</p>	<p>Yes, Payment Standards - Fair Market Rents</p>
<p>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</p>	<p>No</p>
<p>How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?</p>	<p>N/A</p>
<p>Does the MTW activity require an impact analysis?</p>	<p>Yes</p>
<p>Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)</p>	<p>No</p>
<p>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.</p>	<p>N/A</p>
<p>Please provide an explanation as to why the activity was discontinued or will be discontinued.</p>	<p>N/A</p>

<b>3.a., 3.b. - Alternative Reexamination Schedule for Households (PH &amp; HCV)</b>	<b>Answer</b>
What is the recertification schedule?	Once every three years for able-bodied, elderly and/or disabled, households.
How many interim recertifications per year may a household request?	1
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 will not count against the limit on voluntary interim recertifications.

## **FY23 BHA Impact Analysis Activity 5** **Alternative Recertification Schedule**

- 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.

**BHA ACTIVITY 6**  
**Self-Certification of Assets (HCV)**

<b>Core Question/Comment</b>	<b>Answer</b>
<b>Narrative.</b> 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.	The asset self-certification ceiling will be increased from \$5,000 to \$50,000. This will lessen the regulatory responsibilities of the BHA.
<b>MTW Statutory Objectives.</b> Which of the MTW statutory objectives does this MTW activity serve?	Cost effectiveness
<b>Cost implications.</b> What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.	Decreased expenditures
<b>Different policy by household status/family types/sites?</b> Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?	The MTW activity applies to all assisted households
<b>Household Status.</b> 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
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types
<b>Location.</b> 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.	<b>For HCV activities:</b> 1. The MTW activity applies to all tenant-based units 2. 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 hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)	No
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?	No
How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?	N/A
Does the MTW activity require an impact analysis?	No
Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)	No
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
Please provide an explanation as to why the activity was discontinued or will be discontinued.	N/A

<b>3.c., 3.d. - Self-Certification of Assets (PH &amp; HCV)</b>	<b>Input options and instructions</b>
Please state the dollar threshold for the self-certification of assets.	\$50,000



**BHA ACTIVITY 7**  
**Vacancy Loss (HCV)**

Core Question/Comment	Answer
<b>Narrative.</b> 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.	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.
<b>MTW Statutory Objectives.</b> Which of the MTW statutory objectives does this MTW activity serve?	Housing Choice
<b>Cost implications.</b> 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
<b>Different policy by household status/family types/sites?</b> Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?	The MTW activity applies to all assisted households
<b>Household Status.</b> 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
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types
<b>Location.</b> 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.	<b>For HCV activities:</b> 1. The MTW activity applies to all tenant-based units 2. 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 hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)	No
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?	N/A
How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?	N/A
Does the MTW activity require an impact analysis?	No
Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)	No
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
Please provide an explanation as to why the activity was discontinued or will be discontinued.	N/A

4.a., 4.b., 4.c. - Vacancy Loss, Damage Claims, and Other Landlord Incentives (HCV)	Input options and instructions (The same custom questions are asked for each of these activities.)
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)?	<p><input checked="" type="checkbox"/> To all units [No follow-up questions]  <input type="checkbox"/> Certain types of units only [if checked, there are follow up questions]:</p> <p><b>What types of units does this policy apply to?</b>  <input type="checkbox"/> Accessible units  <input type="checkbox"/> Units in particular types of areas or neighborhoods [if checked]: Please describe these areas briefly: [Text box]  <input type="checkbox"/> Units/landlords new to the HCV program  <input type="checkbox"/> Other [if checked]: Please describe briefly [Text box]</p>
What is the maximum payment that can be made to a landlord under this policy?	One (1) month of rent
How many payments were issued under this policy in the most recently completed PHA fiscal year?	N/A
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?	N/A

**BHA ACTIVITY 8**  
**Other Landlord Incentives (HCV)**

Core Question/Comment	Answer
<p><b>Narrative.</b> 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>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).</p> <p>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.</p>
<p><b>MTW Statutory Objectives.</b> Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>Housing Choices</p>
<p><b>Cost implications.</b> 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><b>Different policy by household status/family types/sites?</b> 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><b>Household Status.</b> 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><b>Family Types.</b> 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><b>Location.</b> 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><b>For HCV activities:</b></p> <ol style="list-style-type: none"> <li>1. The MTW activity applies to all tenant-based units</li> <li>2. The MTW activity applies to all properties with project-based vouchers</li> </ol>
<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 hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</p>	<p>No</p>
<p>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</p>	<p>N/A</p>
<p>How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?</p>	<p>N/A</p>
<p>Does the MTW activity require an impact analysis?</p>	<p>No</p>
<p>Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)</p>	<p>No</p>
<p>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.</p>	<p>N/A</p>
<p>Please provide an explanation as to why the activity was discontinued or will be discontinued.</p>	<p>N/A</p>

4.a., 4.b., 4.c. - Vacancy Loss, Damage Claims, and Other Landlord Incentives (HCV)	Input options and instructions (The same custom questions are asked for each of these activities.)
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)?	<p><input checked="" type="checkbox"/> To all units [No follow-up questions]  <input type="checkbox"/> Certain types of units only [if checked, there are follow up questions]:</p> <p><b>What types of units does this policy apply to?</b>  <input type="checkbox"/> Accessible units  <input type="checkbox"/> Units in particular types of areas or neighborhoods [if checked]: Please describe these areas briefly: [Text box]  <input type="checkbox"/> Units/landlords new to the HCV program  <input type="checkbox"/> Other [if checked]: Please describe briefly [Text box]</p>
What is the maximum payment that can be made to a landlord under this policy?	\$1,500
How many payments were issued under this policy in the most recently completed PHA fiscal year?	N/A
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?	N/A

**BHA ACTIVITY 9**  
**Pre-Qualifying Unit Inspections (HCV)**

<b>Core Question/Comment</b>	<b>Answer</b>
<b>Narrative.</b> 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.	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.
<b>MTW Statutory Objectives.</b> Which of the MTW statutory objectives does this MTW activity serve?	Housing Choices
<b>Cost implications.</b> What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.	Neutral
<b>Different policy by household status/family types/sites?</b> Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?	The MTW activity applies to all assisted households
<b>Household Status.</b> 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
<b>Family Types.</b> Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types
<b>Location.</b> 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.	<b>For HCV activities:</b> 1. The MTW activity applies to all tenant-based units 2. 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 hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)	No
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?	No
How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?	N/A
Does the MTW activity require an impact analysis?	No
Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)	No
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
Please provide an explanation as to why the activity was discontinued or will be discontinued.	N/A

<b>5.a. -Pre-Qualifying Unit Inspections (HCV)</b>	<b>Input options and instructions</b>
How long is the pre-inspection valid for?	90 days

**BHA ACTIVITY 10**  
**Alternative Inspection Schedule (HCV)**

Core Question/Comment	Answer
<p><b>Narrative.</b> 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>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.</p> <p>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.</p>
<p><b>MTW Statutory Objectives.</b> Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>Cost-effectiveness</p>
<p><b>Cost implications.</b> 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 revenue  Decreased expenditures</p>
<p><b>Different policy by household status/family types/sites?</b> 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><b>Household Status.</b> 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><b>Family Types.</b> 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><b>Location.</b> 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><b>For HCV activities:</b></p> <ol style="list-style-type: none"> <li>1. The MTW activity applies to all tenant-based units</li> <li>2. The MTW activity applies to all properties with project-based vouchers</li> </ol>
<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 hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</p>	<p>No</p>
<p>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</p>	<p>N/A</p>
<p>How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?</p>	<p>N/A</p>
<p>Does the MTW activity require an impact analysis?</p>	<p>No</p>
<p>Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)</p>	<p>No</p>
<p>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.</p>	<p>N/A</p>
<p>Please provide an explanation as to why the activity was discontinued or will be discontinued.</p>	<p>N/A</p>

<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<p><b>Safe Harbor Waivers seeking HUD Approval:</b>  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 request for approval of a Safe Harbor Waiver this year?</p> <p><input checked="" type="checkbox"/> Yes</p>
<b>E.</b>	<b>Agency-Specific Waivers.</b>
<b>E.1</b>	<p><b>Agency-Specific Waivers for HUD Approval:</b>  The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency’s description of how the comments were considered, as a required attachment to the MTW Supplement.</p> <p>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p><input checked="" type="checkbox"/> No</p>
<b>E.2</b>	<p><b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b>  For each previously approved Agency-Specific Waiver(s), a set of questions will populate.</p> <p>Does the MTW agency have any approved Agency-Specific Waivers?</p> <p><input checked="" type="checkbox"/> No</p>

<b>F.</b>	<b>Public Housing Operating Subsidy Grant Reporting.</b>
<b>F.1</b>	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
2022	N/A	N/A	N/A	9/30/2030
2023	N/A	N/A	N/A	9/30/2031

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.

<b>G.</b>	<b>MTW Statutory Requirements.</b>
<b>G.1</b>	<p><b>75% Very Low Income – Local, Non-Traditional.</b></p> <p>HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA’s most recently completed Fiscal Year for its Local, Non-Traditional program households.</p>

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>
Question	Input options and instructions
Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?	Yes. The BHA will eliminate the Earned Income Disallowance (EID) and utility reimbursements and implement a standard utility allowance. All waivers will be implemented immediately once the FY23 MTW Supplement has been approved by HUD.



<b>G.3</b>	<b>Substantially the Same (STS) – Local, Non-Traditional.</b>	
<b>Questions</b>	<b>Input options and instructions</b>	
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 <b>at or below 80% of AMI</b> in the table provided. 0	

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	General	0	0	No	N/A
	0	0	0	0	0	0	0	General	0	0	No	N/A
	0	0	0	0	0	0	0	General	0	0	No	N/A
	0	0	0	0	0	0	0	General	0	0	No	N/A
	0	0	0	0	0	0	0	General	0	0	No	N/A
	0	0	0	0	0	0	0	General	0	0	No	N/A
	0	0	0	0	0	0	0	General	0	0	No	N/A
	0	0	0	0	0	0	0	General	0	0	No	N/A
	0	0	0	0	0	0	0	General	0	0	No	N/A

<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>
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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	0
2 Person	0
3 Person	0
4 Person	0
5 Person	0
6+ Person	0
<b>Totals</b>	<b>0</b>

<b>G.5</b>	<b>Housing Quality Standards.</b>
	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).

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

<b>I</b>	<b>Evaluations.</b>	
<b>I.1</b>	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.	

<b>Question</b>	<b>Input options and instructions</b>
Does the PHA have an agency-sponsored evaluation?	<b>No</b>

<b>Table I.1 - Evaluations of MTW Policies</b>			
<b>Title and short description</b>	<b>Evaluator name and contact information</b>	<b>Time period</b>	<b>Reports available</b>

<b>J</b>	<b>MTW Certifications of Compliance.</b>	
<b>J.1</b>	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.	

**APPENDIX A – MTW Activity Organizer**

## BHA FY23 MTW Supplement Activity Organizer

BHA Activity #	MTW Waiver	Core Questions	Custom Questions	Safe Harbor	Impact Analysis	Hardship Policy
<b>1. Tenant Rent Policies</b>						
1	j. Alternative Utility Allowance (HCV)	X	X	X		
2	n. Utility Reimbursements (HCV)	X				
3	w. Alternative Income Inclusions / Exclusions (HCV) (Eliminate EID)	X	X			
<b>2. Payment Standards and Rent Reasonableness</b>						
4	b. Payment Standards - Fair Market Rents (HCV) 120% for PBV	X	X	X	X	X
<b>3. Reexaminations</b>						
5	b. Alternative Reexamination Schedule for Households (HCV)	X	X	X	X	X
6	d. Self-Certification of Assets (HCV)	X	X	X		
<b>4. Landlord Leasing Incentives (HQS)</b>						
7	a. Vacancy Loss (HCV)	X	X	X		
8	c. Other Landlord Incentives (HCV)	X	X	X		
<b>5. Housing Quality Standards (HQS)</b>						
9	a. Pre-Qualifying Unit Inspections (HCV)	X	X	X		
10	d. Alternative Inspection Schedule (HCV)	X		X		
BHA Activity #	Safe Harbor Waiver	Core Questions	Custom Questions	Safe Harbor	Impact Analysis	Hardship Policy
<b>2. Payment Standards and Rent Reasonableness</b>						
4	b. Payment Standards - Fair Market Rents (HCV) 150% for TBV	X	X	X	X	X

## **APPENDIX B – Hardship Policy**

## **BERKELEY HOUSING AUTHORITY 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.