



## **Draft HCV MTW Supplement Draft Admin Plan Revision**

### **Resident/Participant Meeting #1**

**Date: March 9, 2023**

**Time: 3:00 pm (CT)**

**Location: Auburn Housing Authority, 931 Booker Streetm Auburn, AL 36832**

### **Resident/Participant Meeting #2**

**Date: March 21, 2023**

**Time: 10:00 am (CT)**

**Location: Auburn Housing Authority, 931 Booker Streetm Auburn, AL 36832**

#### **Draft Housing Choice Voucher (HCV) MTW Supplement and Admin Plan Revision**

The Auburn Housing Authority is receiving public comments regarding the proposed HCV MTW Supplement and Admin Plan revision (the revision includes adding the MTW Supplement). A Resident Meeting will be held on March 9, 2023, at 3pm and March 21, 2023 at 10am at the Auburn Housing Authority located at 931 Booker Street, Auburn, AL 36832 to receive comments regarding the proposed HCV MTW Supplement and Admin Plan revision.

Comments may be submitted at the Auburn Housing Authority's office, during the Resident/Participant Meetings or mailed. Written comments may be mailed to the Auburn Housing Authority, Attn: MTW Supplement and Admin Plan Revision Comments, 931 Booker Street, Auburn, AL 36832.

#### **Availability of Information**

A copy of the draft HCV MTW Supplement and draft Admin Plan Revision are available for public review as follows:

- Auburn Housing Authority, 931 Booker Street, Auburn, AL 36830  
Monday – Thursday, 7:30 am – 5:30 pm
- Website <https://www.auburnhousingauth.org/upages.php?id=259>

For more information, please send an email to [sbarrios@auburnhousingauth.org](mailto:sbarrios@auburnhousingauth.org) or call (334) 821-2262, extension 221.

## MTW Supplement Strategic Plan

*Objectives are subject to change and contingent on Board and HUD approval.*

Proposed activities **must** meet one (1) of the following three (3) statutory objectives:

1. **Cost Effectiveness**      2. **Housing Choice**      3. **Self-Sufficiency**

### Cost Effectiveness

Proposed Activity/Flexibility	Objective	FYB2023	FYB2024	FYB2025
<b>Utility Allowance Calculation Modification</b> A. Calculate UA by bedroom or voucher size (whichever is lower) instead of building type.	Cost Effectiveness		X	
<b>Streamline Recertifications</b> A. Biennial recerts for non-elderly and non-disabled. B. Triennial recerts for elderly and disabled.	Cost Effectiveness	X		
<b>Minimum Rent Increase</b> A. Increase from \$50 to \$100 B. Will not phase in but given ample notice before increase is implemented.	Cost Effectiveness	X		
<b>Income and Rent Share Calculation Modification</b> A. Calculate income based on net income as opposed to adjusted income B. <u>Net income</u> : 1) gross income minus payroll taxes; 2) employee benefit deductions counted as income C. <u>Adjusted Income</u> : income-allowances D. Eliminate regulatory allowances for dependents, elderly/disabled, childcare, medical, etc. and replace with flat allowance for working, elderly, and disabled HOH	Cost Effectiveness		X	
<b>Self-Certification of Assets</b> A. Self-certify assets up to \$50,000 B. 6-month bank statements no longer required	Cost Effectiveness	X		
<b>Operational Efficiency Through Information Technology</b> A. Online applications B. Online recertifications/interims C. Virtual briefings D. Virtual inspections	Cost Effectiveness	X		
<b>Fungibility: HAP and Admin Fees (AF)</b> A. Option to use HAP funding for AF expenses. B. Option to use AP funding for HAP expenses. C. Option to use HAP and/or AF for affordable housing/homeownership initiatives. D. Option to use HAP and/o AF for landlord incentives	Cost Effective & Housing Choice	X		
<b>HCV Admin Plan Modifications</b> A. Eliminate the public comment period or reduce from 45 days to 10.	Cost Effective		X	

## MTW Supplement Strategic Plan

*Objectives are subject to change and contingent on Board and HUD approval.*

Proposed activities must meet one (1) of the following three (3) statutory objectives:

1. Cost Effectiveness      2. Housing Choice      3. Self-Sufficiency

### Housing Choice

Proposed Activity/Flexibility	Objective	FYB2023	FYB2024	FYB2025
<b>Initial Rent Burden</b> A. Initial rent burden calculation changed from 40% to 50%	Housing Choice			X
<b>Landlord incentives</b> A. Repairs B. Vacancy payments C. Signing bonus D. Landlord Liaison position E. Programs to recruit and retain landlords	Housing Choice	X		
<b>Affordable Housing Development/Homeownership</b> A. Utilize HAP and/or Admin Fees as gap financing for affordable housing development initiatives to include but not limited to: 1) Redevelop RAD PBV properties; 2) Homeownership grant and/or loans; 3) Property acquisition	Housing Choice	X		
<b>Increase Payment Standards</b> A. Utilize up to 120% of FMRs for TBV, RAD PBV, and traditional PBV units B. Utilize small area FMRs	Housing Choice	X		
<b>Ready to Rent Certification</b> A. Required to utilize Choice Mobility and HCV Homeownership Program	Housing Choice		X	
<b>Voucher Term</b> A. Extend initial voucher term from 60 days to 120 days due to Auburn’s tight rental market	Housing Choice & Cost Effectiveness	X		
<b>Jurisdictional Agreement</b> A. Expands jurisdiction B. MOU with neighboring PHAs	Housing Choice			X
<b>Portability Jurisdictional Exemption</b> No longer require participant to stay in AHA’s jurisdiction during the first year of receiving a voucher to be eligible to port.	Housing Choice			

## MTW Supplement Strategic Plan

*Objectives are subject to change and contingent on Board and HUD approval.*

Proposed activities must meet one (1) of the following three (3) statutory objectives:

1. **Cost Effectiveness**      2. **Housing Choice**      3. **Self-Sufficiency**

### Self-Sufficiency

Proposed Activity/Flexibility	Objective	FYB2023	FYB2024	FYB2025
<p><b>FSS Program</b></p> <p>A. FSS participants whose income reaches 30% of FMR will be granted a six (6) month extension instead of termination??</p>	Self Sufficiency	X		
<p><b>Employment and Educational Requirements</b></p> <p>C. HOH and members of household that are working age must document employment (full or part-time), pursuing GED or higher education</p> <p>D. AHA anticipates partnering with AHS, SUSCC, and other organizations that offer Job Readiness Programs.</p> <p>E. Unemployed HOH or members of household that are working age are required to participant in Job Readiness Programs in hopes of gaining employment.</p> <p>F. Elderly and disabled exempt</p>	Self Sufficiency		X (planning)	X (implement)

**PHA Name : Auburn**

**PHA Code : AL050**

**MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2023**

**PHA Program Type: Housing Choice Voucher (HCV) only**

**MTW Cohort Number: MTW Flexibility for Smaller PHAs**

**MTW Supplement Submission Type: Annual Submission**

## **B. MTW Supplement Narrative.**

Auburn Housing Authority will utilize MTW funding and regulatory flexibilities to implement the following initiatives that will address the three statutory objectives to include: Cost Effectiveness, Self-Sufficiency, and Housing Choice.

**Cost Effectiveness:** The HA will streamline recertifications by conducting biennial recertifications for non-elderly and non-disabled families and triennial recertifications for elderly, disabled families, and fixed income families. Minimum rent will be increased from \$50 to \$100. A phase in rent option will not be provided, as participants will be given ample notice before the increase is implemented. Participants will self-certify assets up to \$50,000. The HA will provide operation efficiency through information technology (IT) by providing online applications, online recertifications, virtual briefings and virtual inspections. The HA will utilize fungibility between HAP and Admin Fees and use HAP and/or Admin Fees for affordable housing and homeownership initiatives and landlord incentives. AHA will be expanding its efforts to streamline the rent calculation and reexamination process.

**Self-Sufficiency:** The AHA participates in HUD's Family Self Sufficiency Program. As an MTW agency, AHA will have the financial flexibility and opportunity to create community partnerships and ensure HCV participants are provided supportive services and the means to become self-sufficient. The agency may develop its own recruitment and selection procedures for its MTW FSS Program. FSS participants whose income reaches 30% of FMR will be provided a six-month extension instead of termination. We would like Promoting stability for targeted households with specific needs that may be underserved or not well served by traditional HCV programs.

**Increase Housing Choice:** Provide landlord incentives to encourage new landlords. Use HAP and Admin Fees as gap financing for affordable housing development initiatives to include but not limited to: Redevelopment of the RAD PBV properties and property acquisition; Homeownership grant and/or loans; and Property acquisition. Utilize up to 120% of FMR's for TBV, RAD PBV, and traditional PBV units. The AHA may utilize small area FMR's. Extend initial voucher term from 60 days to 120 days due to Auburn's tight rental market.

**C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).**

<b>1. Tenant Rent Policies</b>	
b. Tiered Rent (HCV)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
f. Minimum Rent (HCV)	Plan to Implement in the Submission Year
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Plan to Implement in the Submission Year
q. Imputed Income (HCV)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
<b>2. Payment Standards and Rent Reasonableness</b>	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Plan to Implement in the Submission Year
b. Payment Standards- Fair Market Rents (HCV)	Plan to Implement in the Submission Year
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
<b>3. Reexaminations</b>	
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
d. Self-Certification of Assets (HCV)	Plan to Implement in the Submission Year
<b>4. Landlord Leasing Incentives</b>	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
b. Damage Claims (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Plan to Implement in the Submission Year
<b>5. Housing Quality Standards (HQS)</b>	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
<b>6. Short-Term Assistance</b>	
b. Short-Term Assistance (HCV)	Not Currently Implemented
<b>7. Term-Limited Assistance</b>	
b. Term-Limited Assistance (HCV)	Not Currently Implemented
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	
Increase Elderly Age (PH & HCV)	Not Currently Implemented
<b>9. Project-Based Voucher Program Flexibilities</b>	
a. Increase PBV Program Cap (HCV)	Not Currently Implemented
b. Increase PBV Project Cap (HCV)	Not Currently Implemented
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
a. HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program	

Coordinating Committee (HCV)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>11. MTW Self-Sufficiency Program</b>	
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>12. Work Requirement</b>	
b. Work Requirement (HCV)	Not Currently Implemented
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
<b>14. Moving on Policy</b>	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
<b>17. Local, Non-Traditional Activities</b>	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented
c. Housing Development Programs	Not Currently Implemented

**C. MTW Activities Plan that Auburn Plans to Implement in the Submission Year or Is Currently Implementing**

<b>1.f. - Minimum Rent (HCV)</b>
Voucher holders are required to pay minimum rent of \$50 per month. AHA intends to increase the minimum rent to \$100 per month. Increasing minimum rent incentivize participants that have earned income. An increase in minimum rent results in a reduction in HAP which allows AHA to assist more families.
<b>This MTW activity serves the following statutory objectives:</b>
Cost effectiveness;Self-sufficiency
<b>This MTW activity has the following cost implications:</b>
Increased revenue;Decreased expenditures
<b>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.</b>
The MTW activity applies to all assisted households
<b>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.</b>
N/A
<b>This MTW activity requires a Hardship Policy. The Hardship Policy is attached.</b>
<b>Attached Hardship policy applies to:</b>
1.f. - Minimum Rent (HCV);2.a. - Payment Standards- Small Area Fair Market Rents (HCV);2.b. - Payment Standards- Fair Market Rents (HCV);3.b. - Alternative Reexamination Schedule for Households (HCV)}
<b>No hardship were requested in the most recent fiscal year.</b>



**In the prior year, under this activity, Auburn MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**minimum rent or minimum Total Tenant Payment (TTP) -**

\$50

**1.o. - Initial Rent Burden (HCV)**

AHA desires to change the initial rent burden calculation from 40% to 50%. AHA will waive the maximum family share at the initial occupancy of 40% of a family's monthly net income. By increasing the initial rent burden coupled with the other AHA planned initiatives, AHA believes the change will increase affordable housing options for the families we service. It will allow families to have more equitable housing opportunities in thriving and deconcentrated neighborhoods.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Self-sufficiency;Housing choice

**This MTW activity has the following cost implications:**

Increased revenue;Decreased expenditures

**An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

The MTW activity applies to all assisted households

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

N/A

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Auburn MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**This MTW activity requires an Impact Analysis. The Impact Analysis is attached.**

**The Impact Analysis that applies to this MTW activity also applies to the following MTW activities:**

1.f. - Minimum Rent (HCV);2.a. - Payment Standards- Small Area Fair Market Rents (HCV);3.b. - Alternative

Reexamination Schedule for Households (HCV)

**Maximum income-based rent percentage**

50.00%

**2.a. - Payment Standards- Small Area Fair Market Rents (HCV)**

Under MTW flexibility the AHA is authorized to adopt and implement any reasonable policy to establish payment standards that differ from the currently mandated program requirements. The AHA has previously been approved for Exception Payment Standards and will use the higher of the Small Area Fair Market Rent (SAFMR) and/or the Fair Market Rents (FMR). The AHA's 2022 Exception Payment Standards were based on HUD's 2022 SAFMR and based on zip codes (36830, 36832, and 36865) within AHA jurisdiction. The AHA's current 2023 Payment Standards are based on 120% of HUD's FMRs.

**This MTW activity serves the following statutory objectives:**

Self-sufficiency;Housing choice

**This MTW activity has the following cost implications:**

Increased revenue;Decreased expenditures

**An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

The MTW activity applies to all assisted households

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

N/A

**This MTW activity requires a Hardship Policy. The Hardship Policy is attached.**

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Auburn MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**This MTW activity requires an Impact Analysis. The Impact Analysis is attached.**

**The following describes the payment standards by ZIP code or "grouped" ZIP codes:** The agency is authorized to adopt and implement any reasonable policy to establish payment standards or rent reasonableness that differ from the currently mandated program requirements. The AHA 2023 Exception Payment Standards are based on 120% of HUD's 2023 Fair Market Rents. The 2022 AHA Rents are determined by SAFMR and by Zip Code 36830, 36832, and 36865.

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

Under MTW flexibility the AHA is authorized to adopt and implement any reasonable policy to establish payment standards that differ from the currently mandated program requirements. The AHA has previously been approved for Exception Payment Standards and will use the higher of the Small Area Fair Market Rent (SAFMR) and/or the Fair Market Rents (FMR). The AHA's current 2023 Payment Standards are based on 120% of HUD's FMRs.

The current Auburn Housing Authority 2023 Payment Standards are based on 120% of HUD's Fair Market Rents (FMR).

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Self-sufficiency;Housing choice

**This MTW activity has the following cost implications:**

Increased revenue;Decreased expenditures

**An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

The MTW activity applies to all assisted households

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

N/A

**This MTW activity requires a Hardship Policy. The Hardship Policy is attached.**

No hardship were requested in the most recent fiscal year.

**In the prior year, under this activity, Auburn MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**This MTW activity requires an Impact Analysis. The Impact Analysis is attached.**

**Following will explain the payment standards by FMR:**

Increased payments standards are needed to compete with SRO student housing. Limited rental properties within the jurisdiction and student housing increases landlords rent potential.

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

AHA plans to implement biennial recertifications for non-elderly and non-disabled HCV households; triennial recertifications will be used for elderly, disabled, and fixed income families resulting in a reduction of staff collecting, verifying, and processing data. Streamlined recertifications will also save participants time and cost in regards to complying with the annual recertification documentation requirements.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness;Self-sufficiency

**This MTW activity has the following cost implications:**

Increased revenue;Decreased expenditures

**An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

The MTW activity applies to all assisted households

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

N/A

**This MTW activity requires a Hardship Policy. The Hardship Policy is attached.**

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Auburn MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**This MTW activity requires an Impact Analysis. The Impact Analysis is attached.**

**Recertification Schedule is**

Other

Biennial recertifications will be conducted for non-elderly and non-disabled families . Triennial recertifications will be conducted for elderly, disabled, and fixed income families.

**Household may request 1 interim recertifications per year.**

A family may request an interim once per year based on a 10% increase on approved expenses and deductions and/or a 10% decrease in annualized income.

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

Families self-certify assets received up to \$50,000. This change will decrease the reporting burden on families by no longer requesting bank statements, or verifying stocks and bonds, \$50,000 or less. This change will also significantly reduce AHA's staff administrative burden in collecting and processing data and eliminating the participant from having to pay bank charges for bank statements. The waiver will improve cost effectiveness in our effort to reduce administrative burden while still maintaining the integrity of the rent calculation process.

**This MTW activity serves the following statutory objectives:**

Cost effectiveness

**This MTW activity has the following cost implications:**

Decreased expenditures

**An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

The MTW activity applies to all assisted households

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

what has been accomplished or changed during the implementation.

N/A

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Auburn MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**The dollar threshold for the self-certification of assets is**

\$50,000.

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

AHA's current Landlord Incentive Program is funded through limited funds awarded through the CARES Act and Emergency Housing Vouchers. AHA desires to continue the Landlord Incentive Program in an effort to recruit new landlords and retain landlord participation in the HCV program.

**This MTW activity serves the following statutory objectives:**

Housing choice

**This MTW activity has the following cost implications:**

Increased revenue

**An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

The MTW activity applies to all assisted households

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

N/A

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Auburn MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**This policy applies to**

To all units

**The types of units policy applies to:**

**Maximum payment to the landlord is**

\$Payments equal to no more than one month of the contract rent..

**0 payments were issued under this policy y in the most recently completed PHA fiscal year.**

**\$0 issued under this policy in the most recently completed PHA fiscal year.**

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

The AHA seeks to increase landlord participation and provide increased housing choice for our participants. To incentivize a landlord's continued participants in the HCV program, the agency may provide compensation for damage claims . AHA will develop policies and procedures where as the landlord may collect for damages not exceeding the lesser of the cost of repairs or two months contract rent.

**This MTW activity serves the following statutory objectives:**

Housing choice

**This MTW activity has the following cost implications:**

Increased expenditures

**An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

The MTW activity applies to all assisted households

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

N/A

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Auburn MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is/are hardship requests pending.

**This policy applies to**

To all units

**The types of units policy applies to:**

**Maximum payment to the landlord is**

\$The AHA will create a policy and have procedures in place prior to implementing and the damage claims must not exceed

the cost of repairs or two months of contract rent..

0 payments were issued under this policy y in the most recently completed PHA fiscal year.

\$0 issued under this policy in the most recently completed PHA fiscal year.

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

AHA plans to address housing barriers within our community by utilizing MTW flexibilities and encouraging landlord participation. We hope to create programs to recruit and retain landlords, issue new landlords sign on bonuses, and fill our Landlord Liaison position within the HCV Department.

**This MTW activity serves the following statutory objectives:**

Self-sufficiency;Housing choice

**This MTW activity has the following cost implications:**

Increased expenditures

**An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.**

The MTW activity applies to all assisted households

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

N/A

**No hardship were requested in the most recent fiscal year.**

**In the prior year, under this activity, Auburn MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

**This policy applies to To all units (Display selected and additional Pop up is complex logic.)**

**The types of units policy applies to:**

**Maximum payment to the landlord is**

\$The AHA will create a policy and have procedures in place prior to implementation. Payments made to the landlord must be equal to no more than one month of the contract rent..

0 payments were issued under this policy y in the most recently completed PHA fiscal year.

\$0 issued under this policy in the most recently completed PHA fiscal year.

<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<b>Safe Harbor Waivers seeking HUD Approval:</b> No Safe Harbor Waivers are being requested.

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>
<b>E.1</b>	<b>Agency-Specific Waiver(s) 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, Agency-Specific Waivers may be requested.  No Agency-Specific Waivers are being requested.
<b>E.2</b>	<b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b> MTW Agency does not have approved Agency-Specific Waivers

<b>F.</b>	<b>Public Housing Operating Subsidy Grant Reporting.</b>
<b>F.1</b>	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency.

<b>Federal Fiscal Year (FFY)</b>	<b>Total Operating Subsidy Authorized Amount</b>	<b>How Much PHA Disbursed by the 9/30 Reporting Period</b>	<b>Remaining Not Yet Disbursed</b>	<b>Deadline</b>
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<b>G.</b>	<b>MTW Statutory Requirements.</b>	
<b>G.1</b>	<b>75% Very Low Income – Local, Non-Traditional.</b> 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.	
<b>Income Level</b>	<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>	
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.2</b>	<b>Establishing Reasonable Rent Policy.</b>
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<b>G.3</b>	<b>Substantially the Same (STS) – Local, Non-Traditional.</b>	
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	0 # of unit months	
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	0 # of unit months	

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

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	If Population Type is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.	
<b>Occupied Number of Local, Non-Traditional units by</b>	

<b>Family Size:</b>	<b>Household Size</b>
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>H.</b>	<b>Public Comment</b>
	Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.

<b>I.</b>	<b>Evaluations.</b>
	No known evaluations.

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

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

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

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

\_\_\_\_\_  
**MTW PHA NAME**

\_\_\_\_\_  
**MTW PHA NUMBER/HA CODE**

*I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).*

\_\_\_\_\_  
**NAME OF AUTHORIZED OFFICIAL**

\_\_\_\_\_  
**TITLE**

\_\_\_\_\_  
**SIGNATURE**

\_\_\_\_\_  
**DATE**

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

Auburn Housing Authority

MTW Hardship Policy

Draft

This AHA Hardship Policy applies to the following MTW activities:

1. Tenant Rent Policy – the entire package of changes affecting minimum rent and/or total tenant payment.
2. Payment Standards
3. Initial Rent Burden
4. Biennial and Triennial Recertifications and Interims.

**MTW Activities**

**1. Tenant Rent Policy & Minimum Rent**

Minimum rent will increase from \$50.00 to \$100.00. If the minimum rent and/or paying 30% of the household's monthly-adjusted income creates a hardship, households may pay reduced rent for the period specified according to the policies and guidelines established for Hardship Types determined by AHA.

**2. Payment Standards**

For Tenant Based Vouchers, RAD Project Based Vouchers, and traditional Project Based Vouchers, AHA is raising the payment standard to 120% of the published Fair Market Rent (FMR) or the Small Area FMR's where exception payment standards have been established. Where payment standards cause a household hardship, AHA will apply its Reasonable Accommodation Policy.

**3. Initial Rent Burden**

The AHA initial rent burden calculation is increasing from 40% to 50% of the family's monthly adjusted income.

**4. Biennial Certification and Triennial Recertifications and Interims**

The new recertification schedule will be once every two or three years. Biennial recertifications will be completed for non-elderly and non-disabled households. Triennial recertifications will be completed for elderly and disabled families and fixed income families.

Households may request one interim recertification per year if they have a 10% or more decrease in total household income. Households reporting zero income will have an interim certification when new income begins or after three (3) months of zero income, an interim will be completed with income from previous certification.

For households experiencing a hardship beyond these parameters, AHA will consider classifying it as a long-term hardship according to the established policies and guidelines.

## **Hardship Limitation**

Each household is eligible for only one (1) term of relief for each rent reform initiative. If the household qualifies for more than one relief at any given recertification (annual or interim), the reliefs will be calculated concurrently.

## **Definition of Hardship Types**

The Auburn Housing Authority (AHA) will determine what constitutes financial hardship. A family may request a hardship for the following circumstances.

### ***A Hardship exists when:***

1. Loss of income due to death of the head, spouse, or co-head.
2. The family has experienced a 10% decrease in annualized income because of changed circumstances, including loss or reduction of employment or loss of earnings or other benefit assistance.
3. Awaiting approval for benefit income or eligibility determination for a federal, state, or local assistance program.
4. The family has experienced a 10% or more increase in monthly expenses because of changed circumstances, such as for medical costs, childcare, transportation, education, or similar items.
5. The family would be evicted because of the imposition of MTW activities.
6. Such other situations and factors as determined by the agency to be appropriate based on a case-by-case basis.

### ***No Hardship exists when:***

1. The AHA determines there is no qualifying hardship.
2. MTW activities will be reinstated, including requiring back payment of minimum rent and other costs or fees to the AHA for the time of suspension.

### ***Temporary Hardship exists when:***

1. AHA determines that there is a qualifying hardship but that it is of a temporary nature and less than 90 days.

**AHA Temporary Hardship Procedure:** The MTW activity will not be imposed for a period of 90 days from the date of the family's requests. At the end of the 90-day period, the MTW activity will be imposed retroactively to the time of suspension. AHA will offer a reasonable repayment agreement for any minimum rent back payment and any other costs and fees paid by AHA on the family's behalf during the suspension.

### ***Long Term Hardship exists when:***

1. The AHA determines there is a long-term hardship.
2. The family will be exempt from the MTW activity until the hardship no longer exists.

The AHA Hardship Policy allows AHA the flexibility to address unique, unforeseeable circumstances that may occur and to protect families in crisis. To be considered for a hardship extension, the household must apply for all benefits for which it may be eligible. Family's completing a Zero Income Questionnaire must report income changes when the income begins.

Until income is restored to the household, households must continue to meet the definitions of hardship types provided above and meet all the following criteria:

1. Remain in compliance with all program requirements.
2. Not owe AHA any money or be current with a repayment agreement.
3. Continued lack of income has not been created through the fault of the household.
4. Have applied for financial resources it may be eligible for but has been unsuccessful in securing.
5. Request the hardship waiver within the deadline set by AHA. Households have a minimum of 10 business days from the date of their "Notice of Rent Change" letter to request an Informal Hearing.
6. Have not received hardship relief for the same MTW activity previously.

### **Requesting a Hardship Exception**

The family must complete a Request for Hardship Exemption Form and submit to the HCV Department. Forms received in the office will be date and time stamped upon receiving. Forms are available on the AHA website or upon request at Auburn Housing Authority, 931 Booker Street, Auburn, AL 36832.

If a family requests a hardship exemption, AHA will suspend the MTW activity beginning the month following the family's hardship request. The suspension will continue until AHA can determine whether hardship exists and whether the hardship is of a temporary or long-term nature. During suspension, the family will not be required to participate in relevant MTW activities and support will be adjusted accordingly.

### **Determination of Hardship**

Determination will be made within 30 calendar days. This means the AHA will conduct a reexamination and recalculate the family's portion of rent based on current circumstances until the determination of the hardship is determined.

If the AHA requests information from the family and it is not received within the 30 days after the original request was made, the AHA may deny the requests and require the family to repay the additional assistance paid during the suspension of the MTW activity period.

If AHA determines there is a minimal or no financial hardship, AHA will reinstate the family's previously calculated rent share and require the family to repay the additional assistance paid during the suspension of the MTW activity period. AHA will offer a reasonable repayment agreement.+

If the hardship request does meet the hardship requirements, AHA will continue to provide an exemption from the MTW activity at a reasonable level and duration in accordance with its MTW policies.

## **Appeals**

The family may request a second level review of the denied hardship by submitting a written appeal to the HCV Department. The appeal should contain any information the family would like to be considered during the appeal review including why the family believes the incorrect determination was made. A different staff member than the one making the original denial determination will review the appeal and make determination. The appeal will be reviewed and responded to within 14 days of the receipt of the second level appeal.

If the second review results in the same decision as the original request, the family may request an Informal Hearing according to the AHA's Information Hearing Procedures.

## **Notification of Residents**

AHA will notify residents of the MTW Hardship Policy at the following occurrences:

1. Briefing
2. Intake
3. Recertification
4. If a resident qualifies for a hardship exemption when assistance is to be terminated due to an MTW activity.

## **Record Keeping**

AHA will maintain all records of hardship requests, determinations, and appeals for the duration of its MTW participation.

Records will be maintained in the SACS Database at Tenant Services and Counseling Sessions. Copies of all relevant forms shall be attached to the Counseling Session Attachment Tab. Records will be available for public review and inspection at the AHA Administrative Office and supplied to HUD if requested.

If you have any questions or require a reasonable accommodation in order to fully utilize Auburn Housing Authority's programs and services, please call (334) 811-1161, extension 111.