

IMPACT ANALYSIS – ACTIVITY 2023-01: Special Circumstances Admissions

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

This activity will not have a large impact on the agency's finances as families will only be housed if funds are available, so transfers will be processed instead of new move-ins which will minimally reduce staff work because of the need to determine eligibility from the Housing Choice Voucher wait list, but this will be offset by staff needing to determine the eligibility of applicants for the program from which the families are transferring.

FACTOR 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 not greatly affect housing costs for families. It will allow some displaced families to retain assistance. Under the Moderate Rehabilitation and Shelter Plus Care programs, the family only pays 30% of their income towards rent and utilities. Under the Housing Choice Voucher program, families may select a unit where the family share may be more than 30% of their income, so some families may select units that cause their portion of the rent to increase slightly, but this activity does not change the basic rent calculation under the Housing Choice Voucher program.

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

There may be a slight increase in the wait time for families on the Housing Choice Voucher waitlist since priority for these vouchers would be given to special circumstance admission families. However, this is not expected to be a significant issue since there is currently sufficient funding for the Housing Choice Voucher program and it is not anticipated that a great number of special admissions will be approved per year. The average tenancy for Shelter Plus Care and Mod Rehab families is over 8 years, so families are not turning over at high rates once on these programs.

FACTOR 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 would not affect the termination rate of families.

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

This would minimally increase the agency's utilization rate in the HCV program as these special circumstance admission families would be utilizing the HCV program instead of their respective Shelter Plus Care or Mod Rehab Single Room Occupancy programs by transferring into new units with an issued HCV. Utilization rates in the other programs would have the same impact whether the family transfers to an HCV or moves out of a unit that does not meet its needs.

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

This would meet the goal of housing choice by providing these special circumstance admission families with more housing options.

FACTOR 7: Impact on the agency's ability to meet the MTW statutory requirements

a) Very Low-Income Requirement

Currently, 91% of the families that would be eligible for this activity are below the extremely low-income level for admissions and 100% of the families are below the very low-income level. These families should be representative of the families housed in these two programs, so this activity should not affect the agency's ability to meet this statutory requirement.

b) Reasonable Rent Policy

This does not affect the family's calculation of total tenant payment under the Housing Choice Voucher program.

c) Substantially the Same Requirement

The activity will not increase payments, so the AHA should be able to meet this requirement.

d) Comparable Mix Requirement

The AHA will monitor families housed under this activity to ensure that the comparable mix requirement is met. If a large number of families are housed from the Single Room Occupancy program, this requirement may be affected. It is anticipated, however, that the number of households being admitted from this activity will not impact this requirement.

e) Housing Quality Standards (HQS)

The units would have to continue to meet the HQS standards, so this statutory requirement would be met.

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

This activity would not result in hardship requests as does not affect the HAP or total tenant payment.

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

A chi-squared test of independence found a statistically significant relationship between the tenants in Shelter Plus Care or Mod Rehab SRO participants and those on the waitlist to receive Housing Choice Vouchers for the protected class of disability. There are a higher percentage of families with a disabled head of household in the Shelter Plus Care and Moderate Rehabilitation programs than on the Housing Choice Voucher wait list, so this activity may positively impact families with a head with a disability.

The data for race for the Shelter Plus Care and Mod Rehab programs does not allow for a chi-squared test of independence due to the small number of families; but a statistically valid test can be run for ethnicity which found no relationship between ethnicity and the Housing Choice Voucher wait list families versus the families assisted in the two programs.

There is a statistically significant relationship between age and the Housing Choice Voucher wait list families versus the families assisted in the two programs. There are more elderly families assisted under the two programs than on the Housing Choice Voucher wait list.

While the protected classes are not independent from the families being assisted under the Shelter Plus Care and Moderate Rehabilitation program, in all cases, the number of families on the two programs is higher than what would be expected, so the impact on the protected classes would be a positive one and not a disparate impact.

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