

## **NOTE FROM THE HOUSING AUTHORITY OF THE CITY OF ALAMEDA**

The Housing Authority of the City of Alameda (AHA) will be submitting form HUD-50075-MTW electronically through the Moving to Work (MTW) portal to HUD upon approval of its Board of Commissioners after a public process. Please find the original form HUD-50075-MTW on HUD's website at:

[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/mtw/expansion/mtwsupplement](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw/expansion/mtwsupplement). This document contains the information in the HUD form, but in an easier to read format, including larger print in a format that will be accessible to persons with disabilities when posted online. Most of the instructions and questions in the document are copied directly from the form HUD-50075-MTW (01/2021).

## **EXPLANATORY NOTE TO PUBLIC REVIEWERS OF THE PROPOSED MOVING TO WORK SUPPLEMENT FILLABLE FORM**

The Moving to Work (MTW) Supplement collects information about policies implemented by MTW expansion agencies. MTW agencies use it to communicate their plans with residents and community stakeholders through required public comment processes, and HUD uses the information collected to monitor and evaluate the MTW demonstration program. MTW agencies will submit the MTW Supplement to HUD annually and amend as needed. HUD plans to make the MTW Supplement into a fillable form so as to reduce respondent burden and make the information collected more useful to HUD. When the MTW Supplement is available through the fillable form, it will include skip patterns<sup>1</sup> that prompt the user to populate only the sections relevant to what they are currently implementing. It will also include screening questions that will ask which waivers and associated activities they are currently implementing, plan to implement in the upcoming year, or will be discontinued in the submission year. The MTW Agency will be able to print the information from the MTW Supplement in a reader-friendly format in order to inform the public of its plans for the upcoming year. The purposes of the MTW Supplement are two-fold: it reports to HUD what is happening at the local level in a way that the Department can monitor and evaluate; and, more importantly, it informs the public about what the agency is planning and gives the public the ability to provide comment.

The MTW Supplement asks for information about each of the MTW Waivers and associated activities that are made possible by the MTW Operations Notice, Safe Harbor Waivers and Agency-Specific Waivers, and a few other types of information. MTW agencies will fill in information/data through a fillable form and the information collected will be stored in a database so that it can be analyzed by HUD. The approved forms will be posted to the MTW website for viewing by the public. For instance, it will be simple to find out how many MTW agencies and which MTW agencies are implementing each type of activity. It will also simplify reporting for the MTW agency since information will carry

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<sup>1</sup> A skip pattern is a question or series of questions associated with a conditional response.

over year-to-year in the fillable form so that information that does not change from year to year will be pre-populated, thereby reducing respondent burden.

This document lists the sections of the MTW Supplement and then presents the proposed questions to be included in the MTW Supplement for MTW agencies to answer annually. Throughout the online version, there will be a dropdown menu option that makes it clear as to which activities an agency is permitted to do within the safe harbors of the MTW Operations Notice, Appendix I, MTW Waivers.

### **Sections of the MTW Supplement:**

- A. PHA Information
- B. Narrative
- C. MTW Waivers and Associated MTW Activities
- D. Safe Harbor Waivers
- E. Agency-Specific Waivers
- F. Public Housing Operating Subsidy Grant Reporting
- G. MTW Statutory Requirements
- H. Evaluations
- I. MTW Certifications of Compliance

### **Information to be Collected for MTW Activities**

There are many MTW activities, subject to limitations as outlined in the MTW Operations Notice, that an MTW agency may implement. Each MTW agency will likely only engage in a subset of these MTW activities. The MTW Supplement will first ask MTW agencies to identify which MTW activities they are proposing to implement and which of those MTW activities they are already implementing. MTW agencies will subsequently be asked to provide information only about the MTW activities they are proposing to implement or are already implementing. This feature will reduce respondent burden. MTW waivers have associated MTW activities. MTW agencies are also able to combine MTW activities into their own initiatives.

MTW agencies will be asked for specific information about each MTW activity they are proposing to implement or are already implementing. There are six types of questions that could be asked about each MTW activity. The exact mix of questions will depend partly upon the MTW activity and partly upon the requirements for that MTW activity listed in the MTW Operations Notice. The six types of questions are:

- (1) Core—questions applicable to most MTW activities
- (2) Custom—questions specific to an individual MTW activity
- (3) Safe Harbor Waiver—questions asked when the MTW activity requires a Safe Harbor Waiver
- (4) Hardship Policy—questions asked when the MTW Operations Notice requires a hardship policy for the MTW activity
- (5) Impact Analysis—questions asked when the MTW Operations Notice requires an impact analysis for the MTW activity

(6) Agency-Specific Waiver—questions asked when the MTW activity requires an Agency-Specific Waiver

## Questions

The questions are presented below by type, beginning with the core questions. In the final online version of the MTW Supplement, the relevant questions from each type will be asked together in relation to each MTW activity the MTW agency is proposing to implement or is already implementing. The final online version of the MTW Supplement will be set up to allow for different versions of the same MTW activity—for instance, a different minimum rent for the non-elderly/non-disabled than for the elderly/disabled. The final online version of the MTW Supplement will also be able to autofill items with information from previous years. This feature will reduce respondent burden.

Table 1, at the end of this document, lists the MTW activities and indicates which types of questions need to be asked about each one.

## MTW SUPPLEMENT TO THE ANNUAL PHA PLAN

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

OMB. No. 2577-0226

Expires: 03/31/2024

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

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

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

- (1) **Local, Non-Traditional Activities (LNT)** – Those MTW activities that use MTW funding flexibility outside of the Housing Choice Voucher (HCV) and public housing programs established in Sections 8 and 9 of the U.S. Housing Act of 1937.

- (2) **Safe Harbors** – The additional parameters or requirements, beyond those specified in the MTW activity description itself found in the MTW Operations Notice, following each activity description, that the MTW agency must follow in implementing MTW activities.
- (3) **Substantially the Same Requirement** – A statutory MTW requirement that MTW agencies must continue to assist substantially the same total number of eligible low-income families as would have been served absent the MTW demonstration.

## A. PHA INFORMATION

- A.1 **PHA Name:** Housing Authority of the City of Alameda  
**PHA Code:** CA062  
**MTW Supplement for PHA Fiscal Year Beginning (MM/DD/YYYY):**  
07/01/2023  
**PHA Program Type:** ☐ Public Housing (PH) only  
☒ Housing Choice Voucher (HCV) only  
☐ Combined  
**MTW Cohort Number:** 4 (Landlord Incentives)  
**MTW Supplement Submission Type:**  
☒ Annual Submission  
☐ Amended Annual Submission

## B. NARRATIVE

### B.1 MTW Supplemental Narrative.

The narrative provides the MTW agency with an opportunity to explain to the public, including the families that it serves, its MTW plans for the fiscal year and its short and long-term goals.

The MTW agency should provide a description of how it seeks to further the three MTW statutory objectives during the coming Fiscal Year. Those three MTW statutory objectives are: (1) to reduce cost and achieve greater cost effectiveness in federal expenditures; (2) to give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient; and (3) to increase housing choices for low-income families.

The primary goal of the Housing Authority of the City of Alameda (AHA), in partnership with the entire community, is to advocate and provide quality, affordable, safe housing; encourage self-sufficiency; and strengthen community inclusiveness and diversity in housing. AHA's Vision Statement is: "The Housing Authority of the City of Alameda shall continue to be recognized for creatively seeking ways to expand the availability of affordable housing through Alameda, for caring professional staff, and excellent service provided fairly to all".

During participation in the Landlord Incentives Cohort the AHA will be using creative methods to encourage new landlord participation and continued landlord partnerships expanding housing choice for all voucher holders. During this cohort study, the AHA will continue to develop and maintain quality affordable housing for low-income residents, providing more housing choice along the entire spectrum of housing continuum. The AHA would like to design, implement, and sustain exceptional programs that invest in the residents to become self-sufficient through an array of educational, employment, and economic platforms including exploring the possibility of offering incentives to families to participate in training programs or increasing the ability of participants to attend community college or universities.

The AHA will strive to further the MTW statutory objective to reduce cost and achieve greater cost effectiveness in federal expenditures by continuing the activities proposed for FY 2022-2023 and adding a streamlining of processing Project-Based Voucher rent increases.

The AHA will strive to further the MTW statutory objective to give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient by continuing the activities proposed for FY 2022-2023.

The AHA will strive to further the MTW statutory objective to increase housing choices for low-income families by continuing the activities proposed for FY 2022-2023 and adding three activities to the Project-Based Voucher program and the ability to use RAD in conjunction with the Faircloth limit.

Activities will not apply to Shelter Plus Care, Mod Rehab SRO, VASH or EHV program participants.

## **C. MTW WAIVERS AND ASSOCIATED ACTIVITIES**

**NOTE: MTW agencies are reminded that all MTW Waivers and associated activities must be implemented in accordance with the MTW Operations Notice and within its safe harbors unless a Safe Harbor or Agency-Specific Waiver approval is provided by HUD, in which case, the activity utilizing the Safe Harbor or Agency-Specific Waiver must be implemented in accordance with the terms of the approval.**

**Screeners:**

For all MTW Waivers and Activities in Section C, the screening question listed below will be presented in the fillable form. This will allow the form to only display those waivers that input where is required.

Each waiver and activity will be listed with the following choices. If “Not Currently Implemented” is selected, the agency will not be shown any further questions for the activity.

- Currently Implementing
- Plan to Implement in the Submission Year
- Will be Discontinued in the Submission Year
- Was Discontinued in a previous Submission Year
- Not Currently Implemented

**Core Questions:**

The following core questions apply to all of the MTW Waivers and associated activities listed in the MTW Operations Notice. The core questions collect basic information about any MTW activity proposed or implemented by MTW agencies.

- Narrative. Describe the MTW activity, the MTW agency’s goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.
- MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?
- Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.
- Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?
- Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?
- Family Types. Does the MTW activity apply to all family types or only to selected family types?
- Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.
- Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

- Does this MTW activity require a hardship policy?
- Does the MTW activity require an impact analysis?

### Custom Questions:

Custom questions are tailored to each MTW activity. In what follows, the MTW activities are listed with their custom questions. The final online version of the MTW Supplement will be set up so that if an MTW activity is the same in the HCV and/or public housing programs, the MTW agency fills in the information for public housing, then the information is auto populated for the HCV program. MTW agencies are asked to fill in answers only to questions that are relevant to the MTW activities they propose to implement or are already implementing.

The Housing Authority of the City of Alameda (AHA) submitted the activities marked as “Currently Implementing” with the 2022 MTW Supplement, which has not been approved as of the preparation of this plan, but should be approved and implementation started prior to the implementation of this plan. If HUD does not approve any of the 2022 proposed activities, the below tables will be updated prior to submission.

<b>1. Tenant Rent Policies</b>	
b. Tiered Rent (HCV)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
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)	Not Currently Implemented
q. Impute Income (HCV)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
u. Elimination of 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 (FMR) (HCV)	Not Currently Implemented
b. Payment Standards – Fair Market Rents (HCV)	Currently Implementing
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third Party Requirement	Not Currently Implemented

<b>3. Reexaminations</b>	
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
d. Self-certification of Assets (HCV)	Currently Implementing

<b>4. Landlord Leasing Incentives</b>	
a. Vacancy Loss (HCV-Tenant-Based Assistance)	Currently Implementing
b. Damage Claims (HCV-Tenant-Based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV-Tenant-Based Assistance)	Currently Implementing

<b>5. Housing Quality Standards (HQS)</b>	
a. Pre-Qualifying Unit Inspections (HCV)	Currently Implementing
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Currently Implementing

<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>	
a. Increase Elderly Age (HCV)	Not Currently Implemented

<b>9. Project-Based Voucher Program Flexibilities</b>	
a. Increase PBV Program Cap (HCV)	Currently Implementing
b. Increase PBV Project Cap (HCV)	Currently Implementing
c. Elimination of PBV Selection Process for PHA-Owned Projects without Improvement, Development, or Replacement (HCV)	Currently Implementing
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



<b>9. Project-Based Voucher Program Flexibilities</b>	
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>	Not applicable
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<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>	Not applicable
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<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	Not applicable
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<b>17. Local, Non-Traditional Activities</b>	
a. Rental Subsidy Program	Not Currently Implemented
b. Service Provision	Not Currently Implemented
c. Housing Development Programs	Not Currently Implemented

Core and Custom Question Answers for Activities Plan to Implement in Submission Year or Currently Implemented:

<b>2.b. Payment Standards – Fair Market Rents (HCV)</b>
Currently Implementing
ACTIVITY 2022-01: The Housing Authority of the City of Alameda strives to house families in a small community in the Bay Area. The area is perceived to be one with good schools, high quality local businesses, picturesque neighborhoods, and a caring, involved community resulting in families wanting to rent or buy in the area resulting in high housing costs and limited housing choice. Payment standards set at 150% of FMR will hopefully allow the market to cap rents through rent reasonableness testing and not the payment standards.
Custom Question: Please explain the payment standards by FMR.
The agency may apply a payment standard up to 150% of FMR.
This MTW activity serves the following statutory objectives: <input type="checkbox"/> Cost effectiveness <input type="checkbox"/> Self-sufficiency <input checked="" type="checkbox"/> Housing Choice
This MTW activity has the following cost implications: <input type="checkbox"/> Neutral <input type="checkbox"/> Increased revenue <input type="checkbox"/> Decreased revenue <input checked="" type="checkbox"/> Increased expenditures <input type="checkbox"/> Decreased expenditures
A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies: <input checked="" type="checkbox"/> to all assisted households <input type="checkbox"/> only to a subset or subsets of assisted households
This MTW activity does require a Safe Harbor Waiver.
This MTW activity does require a hardship policy. Hardship policy will be uploaded here, but please see Payment Standards Outside FMR Hardship Policy.
The hardship policy does not apply to more than this MTW activity.
The MTW agency has not modified the hardship policy since the last submission of the MTW Supplement.

<b>2.b. Payment Standards – Fair Market Rents (HCV)</b>
Currently Implementing
How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?
0 hardship requests received during the most recently completed PHA fiscal year (AHA had not implemented MTW activities as of June 30, 2022.)
This MTW activity does require an impact analysis. Impact analysis will be uploaded here, but please see Payment Standard Impact Analysis.
The impact analysis does not apply to more than this MTW activity.
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.
At this time, AHA is waiting on HUD approval to begin implementing activity.
This activity has not been discontinued and is not planned to be discontinued.

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### 3.b. Alternative Reexamination Schedule for Households

#### Currently Implementing

ACTIVITY 2022-02: Reducing family's responsibility to provide income documentation from annually to tri-annually results in less caseworkers needed to process annuals that result in minimal rent changes. Allows stability in rent for tenants and landlords. Families receiving zero income or less than \$5,000 per adult annually in income, living in Mod Rehab SRO, Shelter Plus Care, VASH, or EHV units will receive annual recertifications. AHA will check for families meeting these conditions twice a year (normally January and July) and schedule an annual reexamination as appropriate.

Income increase(s) resulting in an annual increase of \$10,000 needs to be reported. Increases of less than \$10,000 annually do not need to be reported between recertifications. Cumulative increases resulting in more than \$10,000 of income increases needs to be reported when the \$10,000 level is reached.

Families receiving the Earned Income Disallowance (EID) will receive interims to change their EID portion annually that will not count towards the limit.

Owners would still be able to request annual rent increases. These would be processed after a rent reasonableness test is conducted and would not count towards interim cap.

Custom Question: What is the recertification schedule?

- ☐ Once every two years
- ☒ Once every three years
- ☐ Other

Custom Question: How many interim recertifications per year may a household request?

- ☐ 0
- ☐ 1
- ☒ 2 or more

Custom Question: Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.

The family may request one interim per year for an income decrease or family composition change. Reports of income increases of more than \$10,000 do not count towards the interim limit. Involuntary household composition changes do not apply towards the interim limit, for example, reporting the death of a family member will not count towards the interim limit.

If the interim results in a decrease, the family must show that the gross income loss is going to significantly (greater than 10%) and long-term (more than 6 months) change the family's annual income going forward from the income used at the last income

### 3.b. Alternative Reexamination Schedule for Households

calculation. No interim decreases will be processed during the first six months after initial occupancy.

If the family composition change is for an addition of an adult, then eligibility must be determined before an individual can move into the unit. The new adult family member's income will be added during the interim. Family composition changes for minors would be processed at the next triennial or when the household transfers. The family may request an interim for family composition changes once a year, including an increase in subsidy when the family is over-housed. Interims could be requested for additional adults to meet approved reasonable accommodations at any time.

The conditions of receiving a second interim decrease in one year are outlined in the Hardship Policy.

This MTW activity serves the following statutory objectives:

- ☒ Cost effectiveness
- ☒ Self-sufficiency
- ☐ Housing Choice

This MTW activity has the following cost implications:

- ☐ Neutral
- ☐ Increased revenue
- ☐ Decreased revenue
- ☒ Increased expenditures
- ☐ Decreased expenditures

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

- ☒ to all assisted households
- ☐ only to a subset or subsets of assisted households

This MTW activity does not require a Safe Harbor Waiver.

This MTW activity does require a hardship policy Alternative Reexamination Schedule Hardship Policy.

The hardship policy does not apply to more than this MTW activity.

The MTW agency has not modified the hardship policy since the last submission of the MTW Supplement.

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

0 hardship requests received during the most recently completed PHA fiscal year (AHA had not implemented MTW activities as of June 30, 2022.)

This MTW activity does require an impact analysis. Impact analysis will be uploaded here, but please see Alternative Reexamination Schedule Impact Analysis.

<b>3.b. Alternative Reexamination Schedule for 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.
At this time, AHA is waiting on HUD approval to begin implementing activity.
This activity has not been discontinued and is not planned to be discontinued.

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### 3.d. Self-Certification of Assets

#### Currently Implementing

ACTIVITY 2022-03: Allow self-certification of participants on program up to \$50,000 in assets to reduce processing of minimal income from assets. Family must provide statement with any income earned on the assets under penalty of perjury. No other verification would be collected or required. Assets would be defined as in 24 CFR 5.609. Assets that the family does not have access to such as irrevocable trusts and 401K accounts would not count towards this asset limit. Applicants must establish assets and provide verification.

New assets under \$50,000 do not need to be reported between triennials.

Assets for all currently assisted households with a household asset total of less than \$50,000 sum to approximately \$1,900,000. These assets only generate a total across all assisted households of \$6,954 of annual income resulting in a total increase in total tenant payments from all participants of approximately \$2086 per year in additional rent due to these assets. This will be offset by the staff salaries of the time spent obtaining and reviewing verifications of lower amount assets. Households with more than \$50,000 in assets comprise 58% of total household assets. These households would still provide verification of the approximate \$2,700,000 in assets that generate approximately \$5,100 in asset income per year with participants paying a total of approximately \$1556 per year in higher rent due to asset income.

Custom Question: Please state the dollar threshold for the self-certification of assets. Threshold: \$50,000.

This MTW activity serves the following statutory objectives:

- ☒ Cost effectiveness
- ☐ Self-sufficiency
- ☐ Housing Choice

This MTW activity has the following cost implications:

- ☐ Neutral
- ☐ Increased revenue
- ☐ Decreased revenue
- ☐ Increased expenditures
- ☒ Decreased expenditures

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

- ☒ to all assisted households
- ☐ only to a subset or subsets of assisted households

This MTW activity does not require a Safe Harbor Waiver.

This MTW activity does not require a hardship policy.

This MTW activity does not require an impact analysis.

<b>3.d. Self-Certification of Assets</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.
At this time, AHA is waiting on HUD approval to begin implementing activity.
This activity has not been discontinued and is not planned to be discontinued.

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#### 4.a. Vacancy Loss

Currently Implementing

ACTIVITY 2022-04: This activity is to incentivize landlords to participate in the HCV program in combination with activities 2022-05, 2022-06, 2022-07, and 2022-11.

As these activities are implemented to increase landlord participation in the program, units that are required to house voucher holders such as Project-Based Voucher units, ones with a regulatory agreement on the units, Tax Credit units, or ones owned by the Housing Authority are not included in this activity.

This allows the AHA to make a payment up to one month's rent payment to a landlord whose unit was vacated by a participant of the Housing Choice Voucher program and is occupied by a different participant of the Housing Choice Voucher program. The payment would be capped at the reasonable rent to owner minus any payments the owner received that month from any source. The payment would be made after the execution of the HAP contract.

Custom Question: 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 low-poverty neighborhood, or units/landlords new to the HCV program?)

☐ To all units

☒ Certain types of units only

If certain types of units only, what types of units does this policy apply to?

☒ Accessible units

☐ Units in particular types of areas or neighborhoods

☐ Units/landlords new to the HCV program

☒ Other. Please describe briefly:

Does not apply to PHA owned, LIHTC units, or units with regulatory agreements. Project-Based Voucher units have a non-MTW vacancy loss.

Custom Question: What is the maximum payment that can be made to a landlord under this policy?

One month rent

Custom Question: How many payments were issued under this policy in the most recently completed PHA fiscal year?

AHA had not implemented MTW activities as of June 30, 2022

Custom Question: What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?

AHA had not implemented MTW activities as of June 30, 2022

This MTW activity serves the following statutory objectives:

☐ Cost effectiveness

#### 4.a. Vacancy Loss

- ☐ Self-sufficiency
- ☒ Housing Choice

This MTW activity has the following cost implications:

- ☐ Neutral
- ☐ Increased revenue
- ☐ Decreased revenue
- ☒ Increased expenditures
- ☐ Decreased expenditures

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

- ☐ to all assisted households
- ☒ only to a subset or subsets of assisted households

A MTW activity can apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households. This MTW activity applies to:

- ☐ New admissions (i.e., applicants) only
- ☐ Currently assisted households only
- ☒ New admissions and currently assisted households

A MTW activity can apply to all family types or only selected family types. This MTW activity applies to:

- ☒ all family types
- ☐ only to selected family types

An MTW activity can apply to a tenant-based and or project-based voucher.

- ☐ The MTW activity applies to all tenant-based units.
- ☐ The MTW activity applies to all properties with project-based vouchers.
- ☒ The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers. The description of which tenant-based units and/or properties with project-based vouchers that will participate in this MTW activity is:

It does not apply to PHA owned, LIHTC units, units with regulatory agreements, or Project-Based Voucher units

This MTW activity does not require a Safe Harbor Waiver.

This MTW activity does not require a hardship policy.

This MTW activity does not require an impact analysis.

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>4.a. Vacancy Loss</b>
At this time, AHA is waiting on HUD approval to begin implementing activity.
This activity has not been discontinued and is not planned to be discontinued.

DRAFT

#### 4.c. Other Landlord Incentives

##### Currently Implementing

ACTIVITY 2022-05: This activity to incentivize landlords to participate in the HCV program in combination with activities 2022-04, 2022-06, 2022-07, and 2022-11.

As these activities are implemented to increase landlord participation in the program, units that are required to house voucher holders such as Project-Based Voucher units, ones with a regulatory agreement on the units, Tax Credit units, or ones owned by the Housing Authority are not included in this activity.

This activity allows the AHA to pay the landlord an incentive to lease up a Housing Choice Voucher (HCV) program participant. The AHA would offer an array of incentives, but the total incentive paid to one landlord could not exceed more than one month of the contract rent of the unit and would be paid at the time of HAP execution.

The proposed incentives are:

First-time Rental incentive: \$1,500

Accessible unit incentive: \$2,000

HQS incentive: \$100

Returning Landlord incentive: \$1,000

A first-time rental incentive would be paid to a landlord that is bringing a unit that has never been leased with the same landlord under the HCV program before. The accessible unit incentive would be paid to landlords providing a unit that meets or mostly meets the requirements for an ADA accessible unit to a family with a member with a disability. The HQS incentive would be paid to landlords whose unit passed an initial housing quality standards inspection the first time and resulted in a participant of the HCV program renting the unit. The returning landlord incentive would be paid to a landlord leasing a unit to an HCV participant that has been on the program prior.

Custom Question: 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 low-poverty neighborhood, or units/landlords new to the HCV program?

☐ To all units

☒ Certain types of units only

If certain types of units only, what types of units does this policy apply to?

☒ Accessible units

☐ Units in particular types of areas or neighborhoods

☒ Units/landlords new to the HCV program

☒ Other. Please describe briefly:

Does not apply to PHA owned, LIHTC units, units with regulatory agreements, or Project-Based Voucher units.

#### 4.c. Other Landlord Incentives

Custom Question: What is the maximum payment that can be made to a landlord under this policy?

One month rent

Custom Question: How many payments were issued under this policy in the most recently completed PHA fiscal year?

AHA had not implemented MTW activities as of June 30, 2022

Custom Question: What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?

AHA had not implemented MTW activities as of June 30, 2022

This MTW activity serves the following statutory objectives:

- ☐ Cost effectiveness
- ☐ Self-sufficiency
- ☒ Housing Choice

This MTW activity has the following cost implications:

- ☐ Neutral
- ☐ Increased revenue
- ☐ Decreased revenue
- ☒ Increased expenditures
- ☐ Decreased expenditures

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

- ☐ to all assisted households
- ☒ only to a subset or subsets of assisted households

A MTW activity can apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households. This MTW activity applies to:

- ☐ New admissions (i.e., applicants) only
- ☐ Currently assisted households only
- ☒ New admissions and currently assisted households

A MTW activity can apply to all family types or only selected family types. This MTW activity applies to:

- ☒ all family types
- ☐ only to selected family types

An MTW activity can apply to a tenant-based and or project-based voucher.

- ☒ The MTW activity applies to all tenant-based units.
- ☐ The MTW activity applies to all properties with project-based vouchers.

**4.c. Other Landlord Incentives**

☐ The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers. The description of which tenant-based units and/or properties with project-based vouchers that will participate in this MTW activity is:

Does not apply to PHA owned, LIHTC units, units with regulatory agreements, or Project-Based Voucher units.

This MTW activity does not require a Safe Harbor Waiver.

This MTW activity does not require a hardship policy.

This MTW activity does not require an impact analysis.

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.

At this time, AHA is waiting on HUD approval to begin implementing activity.

This activity has not been discontinued and is not planned to be discontinued.

DRAFT

<b>5.a. Pre-Qualifying Unit Inspections</b>
Currently Implementing
<p>ACTIVITY 2022-06: This activity to incentivize landlords to participate in the HCV program in combination with activities 2022-04, 2022-05, 2022-07, and 2022-11.</p> <p>Initial inspections of units can be conducted up to 90 days prior to unit lease-up to help incentivize landlords to participate in the program and avoid delays in leasing. Participants or landlords can request a special (interim) inspection at any time.</p>
<p>Custom Question: How long is the pre-inspection valid for?</p> <p>90 days</p>
<p>This MTW activity serves the following statutory objectives:</p> <p><input type="checkbox"/> Cost effectiveness</p> <p><input type="checkbox"/> Self-sufficiency</p> <p><input checked="" type="checkbox"/> Housing Choice</p>
<p>This MTW activity has the following cost implications:</p> <p><input checked="" type="checkbox"/> Neutral</p> <p><input type="checkbox"/> Increased revenue</p> <p><input type="checkbox"/> Decreased revenue</p> <p><input type="checkbox"/> Increased expenditures</p> <p><input type="checkbox"/> Decreased expenditures</p>
<p>A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:</p> <p><input checked="" type="checkbox"/> to all assisted households</p> <p><input type="checkbox"/> only to a subset or subsets of assisted households</p>
This MTW activity does not require a Safe Harbor Waiver.
This MTW activity does not require a hardship policy.
This MTW activity does not require an impact analysis.
<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>At this time, AHA is waiting on HUD approval to begin implementing activity.</p> <p>This activity has not been discontinued and is not planned to be discontinued.</p>

#### 5.d. Alternative Inspection Schedule

Currently Implementing

ACTIVITY 2022-07: This activity to incentivize landlords to participate in the HCV program in combination with activities 2022-04, 2022-05, 2022-06, and 2022-11.

Require inspections only once every three years for private landlord units.  
Participants and landlords can request a special (interim) inspection at any time. A special inspection can be initiated by the AHA if it receives indications that the family's unit is not in compliance with HQS.

This MTW activity serves the following statutory objectives:

- ☒ Cost effectiveness
- ☐ Self-sufficiency
- ☒ Housing Choice

This MTW activity has the following cost implications:

- ☐ Neutral
- ☐ Increased revenue
- ☐ Decreased revenue
- ☐ Increased expenditures
- ☒ Decreased expenditures

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

- ☐ to all assisted households
- ☒ only to a subset or subsets of assisted households

A MTW activity can apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households. This MTW activity applies to:

- ☐ New admissions (i.e., applicants) only
- ☐ Currently assisted households only
- ☒ New admissions and currently assisted households

A MTW activity can apply to all family types or only selected family types. This MTW activity applies to:

- ☒ all family types
- ☐ only to selected family types

An MTW activity can apply to a tenant-based and or project-based voucher.

- ☒ The MTW activity applies to all tenant-based units.
- ☐ The MTW activity applies to all properties with project-based vouchers.
- ☐ The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers. The description of which tenant-based units and/or properties with project-based vouchers that will participate in this MTW activity is:

This MTW activity does not require a Safe Harbor Waiver.



<b>5.d. Alternative Inspection Schedule</b>
This MTW activity does not require a hardship policy.
This MTW activity does not require an impact analysis.
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.
At this time, AHA is waiting on HUD approval to begin implementing activity.
This activity has not been discontinued and is not planned to be discontinued.

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<b>9.a. Increase PBV Cap</b>
Currently Implementing
<p>ACTIVITY 2022-08: Assisted families in the Housing Choice Voucher program frequently inquire how to move to Project-Based Voucher (CAP) units and during the last wait list opening, numerous HCV families applied for the PBV wait lists indicating a desire to have a long-term contract with owners rather than a 1-year contract that can then be canceled with no reason. By project-basing more vouchers, more housing is secured for families without the threat of eviction.</p> <p>This activity would raise the cap for which the AHA could award Project-Based Voucher contracts. The AHA currently has selections and/or HAP contracts for its entire allocation of PBV under the current caps.</p>
<p>Custom Question: What percentage of total authorized HCV units will be authorized for project-basing?</p> <p>50% of the lower of either the total authorized units or annual budget authority</p>
<p>This MTW activity serves the following statutory objectives:</p> <p><input type="checkbox"/> Cost effectiveness</p> <p><input type="checkbox"/> Self-sufficiency</p> <p><input checked="" type="checkbox"/> Housing Choice</p>
<p>This MTW activity has the following cost implications:</p> <p><input checked="" type="checkbox"/> Neutral</p> <p><input type="checkbox"/> Increased revenue</p> <p><input type="checkbox"/> Decreased revenue</p> <p><input type="checkbox"/> Increased expenditures</p> <p><input type="checkbox"/> Decreased expenditures</p>
<p>A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:</p> <p><input checked="" type="checkbox"/> to all assisted households</p> <p><input type="checkbox"/> only to a subset or subsets of assisted households</p>
This MTW activity does not require a Safe Harbor Waiver.
This MTW activity does not require a hardship policy.
This MTW activity does not require an impact analysis.
<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>At this time, AHA is waiting on HUD approval to begin implementing activity.</p> <p>This activity has not been discontinued and is not planned to be discontinued.</p>

**9.b. Increase PBV Project Cap**

Currently Implementing

ACTIVITY 2022-09: Allows more than the greater of 25 units or 25% of the units at a complex to receive Project-Based Voucher assistance. Under current regulations, units that are for the elderly or those providing supportive services are already exempt from this cap. This activity would allow units that may not be serving the above populations to go above the cap up to 100% of the units at a project.

This MTW activity serves the following statutory objectives:

- ☐ Cost effectiveness
- ☐ Self-sufficiency
- ☒ Housing Choice

This MTW activity has the following cost implications:

- ☒ Neutral
- ☐ Increased revenue
- ☐ Decreased revenue
- ☐ Increased expenditures
- ☐ Decreased expenditures

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

- ☒ to all assisted households
- ☐ only to a subset or subsets of assisted households

This MTW activity does not require a Safe Harbor Waiver.

This MTW activity does not require a hardship policy.

This MTW activity does not require an impact analysis.

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.

At this time, AHA is waiting on HUD approval to begin implementing activity.

This activity has not been discontinued and is not planned to be discontinued.

**9.c. Elimination of PBV Selection Process for PHA-owned Projects without Improvement, Development, or Replacement**

Currently Implementing

ACTIVITY 2022-010: This activity would allow the AHA to award project-based voucher units to a property owned by a single-asset entity (S.A.E.) of the AHA without engaging in a selection process. Currently, the AHA must open a Request for Proposals (RFP) to all interested owners when it awards PBV units. This process requires a significant amount of staff time to prepare the RFP, receive and organize proposals for review, score proposals, notify owners of the outcome, and track awards until execution of contract. This would allow the AHA to award vouchers without the RFP to units in the AHA's portfolio that qualify for PBV after conducting a Subsidy Layering Review, ensuring the property is compliant with HUD's site selection requirements, and having a 3<sup>rd</sup> party conduct HQS inspections of the units.

This MTW activity serves the following statutory objectives:

- ☒ Cost effectiveness
- ☐ Self-sufficiency
- ☐ Housing Choice

This MTW activity has the following cost implications:

- ☐ Neutral
- ☐ Increased revenue
- ☐ Decreased revenue
- ☐ Increased expenditures
- ☒ Decreased expenditures

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

- ☐ to all assisted households
- ☒ only to a subset or subsets of assisted households

A MTW activity can apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households. This MTW activity applies to:

- ☐ New admissions (i.e., applicants) only
- ☐ Currently assisted households only
- ☒ New admissions and currently assisted households

A MTW activity can apply to all family types or only selected family types. This MTW activity applies to:

- ☒ all family types
- ☐ only to selected family types
- ☐ Other – another specifically defined target population or populations. The description of this population is:

An MTW activity can apply to a tenant-based and or project-based voucher.

- ☐ The MTW activity applies to all tenant-based units.

**9.c. Elimination of PBV Selection Process for PHA-owned Projects without Improvement, Development, or Replacement**

- ☐ The MTW activity applies to all properties with project-based vouchers.
- ☒ The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers. The description of which tenant-based units and/or properties with project-based vouchers that will participate in this MTW activity is:

Applies only to units owned by a single-asset entity of the PHA.

This MTW activity does not require a Safe Harbor Waiver.

This MTW activity does not require a hardship policy.

This MTW activity does not require an impact analysis.

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.

At this time, AHA is waiting on HUD approval to begin implementing activity.

This activity has not been discontinued and is not planned to be discontinued.

<b>Cohort 4.2 Front-End Vacancy Loss Payment</b>
Currently Implementing
<p>ACTIVITY 2022-11: This activity is to incentivize landlords to participate in the HCV program in combination with activities 2022-04, 2022-05, 2022-06, and 2022-07.</p> <p>As these activities are implemented to increase landlord participation in the program, units that are required to house voucher holders such as Project-Based Voucher units, ones with a regulatory agreement on the units, Tax Credit units, or ones owned by the Housing Authority are not included in this activity.</p> <p>Similar to ACTIVITY 2022-04 except this allows the AHA to make a payment up to one month's rent payment to a landlord whose unit was not vacated by a participant of the Housing Choice Voucher program and is subsequently occupied by a participant of the Housing Choice Voucher program. The payment would be made after the execution of the HAP contract.</p>
<p>This MTW activity serves the following statutory objectives:</p> <p><input type="checkbox"/> Cost effectiveness</p> <p><input type="checkbox"/> Self-sufficiency</p> <p><input checked="" type="checkbox"/> Housing Choice</p>
<p>This MTW activity has the following cost implications:</p> <p><input type="checkbox"/> Neutral</p> <p><input type="checkbox"/> Increased revenue</p> <p><input type="checkbox"/> Decreased revenue</p> <p><input checked="" type="checkbox"/> Increased expenditures</p> <p><input type="checkbox"/> Decreased expenditures</p>
<p>A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:</p> <p><input type="checkbox"/> to all assisted households</p> <p><input checked="" type="checkbox"/> only to a subset or subsets of assisted households</p>
<p>A MTW activity can apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households. This MTW activity applies to:</p> <p><input type="checkbox"/> New admissions (i.e., applicants) only</p> <p><input type="checkbox"/> Currently assisted households only</p> <p><input checked="" type="checkbox"/> New admissions and currently assisted households</p>
<p>A MTW activity can apply to all family types or only selected family types. This MTW activity applies to:</p> <p><input checked="" type="checkbox"/> all family types</p> <p><input type="checkbox"/> only to selected family types</p>
<p>An MTW activity can apply to a tenant-based and or project-based voucher.</p>

**Cohort 4.2 Front-End Vacancy Loss Payment**

- ☐ The MTW activity applies to all tenant-based units.
- ☐ The MTW activity applies to all properties with project-based vouchers.
- ☒ The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers. The description of which tenant-based units and/or properties with project-based vouchers that will participate in this MTW activity is:

Does not apply to PHA owned, LIHTC units, or units with regulatory agreements.  
Would not apply to Project-Based Voucher units.

This MTW activity does not require a Safe Harbor Waiver.

This MTW activity does not require a hardship policy.

This MTW activity does not require an impact analysis.

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.

At this time, AHA is waiting on HUD approval to begin implementing activity.

This activity has not been discontinued and is not planned to be discontinued.

## **D. SAFE HARBOR WAIVERS**

### **D.1. Safe Harbor Waivers seeking HUD Approval:**

The MTW Operations Notice describes a simplified process for MTW agencies to implement MTW activities outside of the safe harbors described in Appendix I. For each Safe Harbor Waiver request, a document that includes the following information must be provided: (a) the name and number of the MTW Waiver and associated activity for which the MTW agency is seeking to expand the safe harbor, (b) the specific safe harbor and its implementing regulation, (c) the proposed MTW activity the MTW agency wishes to implement via this Safe Harbor Waiver, (d) a description of the local issue and why such an expansion is needed to implement the MTW activity, (e) an impact analysis, (f) a description of the hardship policy for the MTW activity, if applicable, and (g) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.

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

☒ No ☐ Yes

## **E. AGENCY SPECIFIC WAIVERS**

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

The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.

In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.

For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.

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



☐ No [If no, skip to E.2] ☒ Yes [If yes, please provide a title and upload required information in a-h above for each Agency-Specific Waiver request]

The AHA is requesting the following Agency-Specific Waivers:

ACTIVITY 2023-01: Special Circumstances Admissions

ACTIVITY 2023-02: Project-Based Voucher Contract Rent Increases

ACTIVITY 2023-03: Project-Based Voucher First Year Moves

ACTIVITY 2023-04: Blended Subsidies or Contribution to Development Costs in Faircloth-to-RAD Conversions

ACTIVITY 2023-05: Flexible Subsidy Standards in Project-Based Voucher Admissions

The proposed following activities are for implementation during the 2023-2024 Fiscal Year.

<b>ACTIVITY 2023-01: Special Circumstance Admissions</b>
Families in units not meeting the family's need due to an approved Reasonable Accommodation or due to a situation protected under the Violence Against Women's Act, would be issued a voucher if one is available with funding without being placed on a wait list to transfer to a unit that meets the family's needs.  This would allow tenants in Shelter Plus Care or Mod Rehab SRO participants to receive Housing Choice Vouchers for Reasonable Accommodation or under the Violence Against Women's Act without applying during a wait list opening and going through a random selection process.  Waive: 24 CFR 982.202 (a)
This MTW activity serves the following statutory objectives: <input type="checkbox"/> Cost effectiveness <input type="checkbox"/> Self-sufficiency <input checked="" type="checkbox"/> Housing Choice
This initiative achieves one or more of the 3 MTW above statutory objectives by: This activity would allow families in assisted units to find units through a different assistance program that meets their needs due to reasonable accommodation or VAWA without waiting on the Housing Choice Voucher wait list.
A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies: <input type="checkbox"/> to all assisted households

**ACTIVITY 2023-01: Special Circumstance Admissions**

☒ only to a subset or subsets of assisted households

A MTW activity can apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households. This MTW activity applies to:

- ☒ New admissions (i.e., applicants) only  
☐ Currently assisted households only  
☐ New admissions and currently assisted households

A MTW activity can apply to all family types or only selected family types. This MTW activity applies to:

- ☐ all family types  
☒ only to selected family types

Please select the family types subject to this MTW activity:

- ☐ Non-elderly, non-disabled families  
☐ Elderly families  
☒ Disabled families (to the extent those families are not exempt via a reasonable accommodation)  
☒ Other – another specifically defined target population or populations. The description of this population is: families assisted under the Mod Rehab SRO program (women who are victims of domestic violence) and the Shelter Plus Care program.

An MTW activity can apply to a tenant-based and or project-based voucher.

- ☐ The MTW activity applies to all tenant-based units.  
☐ The MTW activity applies to all properties with project-based vouchers.  
☒ The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers. The description of which tenant-based units and/or properties with project-based vouchers that will participate in this MTW activity is: Applicants

This MTW activity has the following cost implications:

- ☒ Neutral  
☐ Increased revenue  
☐ Decreased revenue  
☐ Increased expenditures  
☐ Decreased expenditures

The implementation timeline for the initiative is:

Upon approval of MTW Supplement, approval of revised Administrative Plan and training of staff.

This MTW activity does require an impact analysis.

<b>ACTIVITY 2023-01: Special Circumstance Admissions</b>
This MTW activity does not require a hardship policy.
Comments received at the public hearing for the Agency-Specific waiver and the agency's description of how the comments were considered will be inserted after public hearing.

DRAFT

**ACTIVITY 2023-02: Project-Based Voucher Contract Rent Increases**

All rent increases for Project-Based Voucher units would be increased once a year at the AHA's fiscal year (effective July 1) rather than the contract's anniversary date.

Waive: 24 CFR 983.302 (b) (2)

This MTW activity serves the following statutory objectives:

- ☒ Cost effectiveness
- ☐ Self-sufficiency
- ☐ Housing Choice

This initiative achieves one or more of the 3 MTW above statutory objectives by:  
Allows staff to bundle these rent increases once a year to efficiently determine rent reasonableness and ensure notice requirements were met in a timely manner rather than stagger rent increase determinations throughout the year.

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

- ☐ to all assisted households
- ☒ only to a subset or subsets of assisted households

A MTW activity can apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households. This MTW activity applies to:

- ☐ New admissions (i.e., applicants) only
- ☐ Currently assisted households only
- ☒ New admissions and currently assisted households

A MTW activity can apply to all family types or only selected family types. This MTW activity applies to:

- ☒ all family types
- ☐ only to selected family types

Please select the family types subject to this MTW activity:

- ☐ Non-elderly, non-disabled families
- ☐ Elderly families
- ☐ Disabled families (to the extent those families are not exempt via a reasonable accommodation)
- ☐ Other – another specifically defined target population or populations. The description of this population is:

An MTW activity can apply to a tenant-based and or project-based voucher.

- ☐ The MTW activity applies to all tenant-based units.
- ☒ The MTW activity applies to all properties with project-based vouchers.

**ACTIVITY 2023-02: Project-Based Voucher Contract Rent Increases**

☐ The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers. The description of which tenant-based units and/or properties with project-based vouchers that will participate in this MTW activity is:

This MTW activity has the following cost implications:

- ☒ Neutral
- ☐ Increased revenue
- ☐ Decreased revenue
- ☐ Increased expenditures
- ☐ Decreased expenditures

The implementation timeline for the initiative is:  
July 1, 2024

This MTW activity does require an impact analysis.

This MTW activity does not require a hardship policy.

Comments received at the public hearing for the Agency-Specific waiver and the agency's description of how the comments were considered will be inserted after public hearing.

**ACTIVITY 2023-03: Project-Based Voucher First Year Moves**

Allow Project-Based Voucher families to receive a Housing Choice Voucher within 1-year of start of tenancy for Reasonable Accommodation or under the Violence Against Women's Act or upon demonstration of good cause.

Good cause would be at the discretion of the Director of Housing Programs and could include, but is not limited to, a death in the unit, conflict with the landlord or neighbors or a change in the family's circumstance that requires the family to relocate.

Waive: 24 CFR 983.261 (a)

This MTW activity serves the following statutory objectives:

- ☐ Cost effectiveness
- ☐ Self-sufficiency
- ☒ Housing Choice

This initiative achieves one or more of the 3 MTW above statutory objectives by: Allows Project-Based Voucher families a housing choice that meets their needs outside of the portfolio during their first year of occupancy. Families in units not meeting the family's needs due to an approved Reasonable Accommodation or due to a situation protected under the Violence Against Women's Act, would be issued a voucher if one is available with funding without being placed on a wait list to transfer to a unit that meets the family's needs.

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

- ☐ to all assisted households
- ☒ only to a subset or subsets of assisted households

A MTW activity can apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households. This MTW activity applies to:

- ☐ New admissions (i.e., applicants) only
- ☒ Currently assisted households only
- ☐ New admissions and currently assisted households

A MTW activity can apply to all family types or only selected family types. This MTW activity applies to:

- ☒ all family types
- ☐ only to selected family types

Please select the family types subject to this MTW activity:

- ☐ Non-elderly, non-disabled families
- ☐ Elderly families
- ☐ Disabled families (to the extent those families are not exempt via a reasonable accommodation)

**ACTIVITY 2023-03: Project-Based Voucher First Year Moves**

☐ Other – another specifically defined target population or populations. The description of this population is:

An MTW activity can apply to a tenant-based and or project-based voucher.

☐ The MTW activity applies to all tenant-based units.

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

☐ The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers. The description of which tenant-based units and/or properties with project-based vouchers that will participate in this MTW activity is:

This MTW activity has the following cost implications:

☒ Neutral

☐ Increased revenue

☐ Decreased revenue

☐ Increased expenditures

☐ Decreased expenditures

The implementation timeline for the initiative is:

Upon approval of MTW Supplement, approval of revised Administrative Plan and training of staff.

This MTW activity does require an impact analysis.

This MTW activity does not require a hardship policy.

Comments received at the public hearing for the Agency-Specific waiver and the agency's description of how the comments were considered will be inserted after public hearing.

**ACTIVITY 2023-04: Blended Subsidies or Contribution to Development Costs in Faircloth-to-RAD Conversions**

During the earlier part of calendar year 2021, guidance was provided to PHAs regarding the availability of Faircloth-to-RAD conversions. Documentation from the PIH Office of Capital Improvements, as of September 30, 2021, showed that the Housing Authority of the City of Alameda (AHA) had an availability of 120 units remaining under the Authority's Faircloth limit. AHA has been actively involved in creating and preserving additional affordable housing within the City of Alameda through acquisitions, rehabilitations, and new developments. AHA is considering opportunities where a Faircloth-to-RAD conversion may be beneficial and the use of MTW funds will make the project feasible.

The AHA may use MTW funds flexibly to make Faircloth-to-RAD transactions feasible to supplement RAD rents as housing assistance payments; to pay for acquisition, rehabilitation or construction costs or contributing to development costs in another manner; or to increase housing choices for low-income families by using its 120-unit Faircloth-to-RAD authorization to produce additional project-based vouchers.

Once the program plan is approved by HUD, AHA will begin to investigate potential developments that may stand to benefit from the flexibility provided by a blended subsidy if pursuing a Faircloth-to-RAD conversion. Once potential developments are identified and the decision is made to move forward, AHA will follow Faircloth-to-RAD guidance.

This MTW activity serves the following statutory objectives:

- ☐ Cost effectiveness
- ☐ Self-sufficiency
- ☒ Housing Choice

This MTW activity has the following cost implications:

- ☒ Neutral
- ☐ Increased revenue
- ☐ Decreased revenue
- ☐ Increased expenditures
- ☐ Decreased expenditures

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

- ☒ to all assisted households
- ☐ only to a subset or subsets of assisted households

**If previous questions is subset.**

A MTW activity can apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households. This MTW activity applies to:

- ☐ New admissions (i.e., applicants) only



**ACTIVITY 2023-04: Blended Subsidies or Contribution to Development Costs in Faircloth-to-RAD Conversions**

- ☐ Currently assisted households only  
☐ New admissions and currently assisted households

**If above questions is subset.**

A MTW activity can apply to all family types or only selected family types. This MTW activity applies to:

- ☐ all family types  
☐ only to selected family types

Please select the family types subject to this MTW activity:

- ☐ Non-elderly, non-disabled families  
☐ Elderly families  
☐ Disabled families (to the extent those families are not exempt via a reasonable accommodation)  
☐ Other – another specifically defined target population or populations. The description of this population is:

**If above questions is subset.**

An MTW activity can apply to a tenant-based and or project-based voucher.

- ☐ The MTW activity applies to all tenant-based units.  
☐ The MTW activity applies to all properties with project-based vouchers.  
☐ The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers. The description of which tenant-based units and/or properties with project-based vouchers that will participate in this MTW activity is:

This MTW activity does not require a Safe Harbor Waiver.

This MTW activity does not require a hardship policy.

This MTW activity does require an impact analysis.

The impact analysis does not apply to more than this MTW activity.

**ACTIVITY 2023-05: Flexible Subsidy Standards in Project-Based Voucher Admissions**

The same subsidy standards as the Housing Choice Voucher will apply to the Project-Based Voucher program except in the following situations: 1) as allowed under activity 2022-12 in the FY2023 MTW Supplement (if approved); 2) when other funding is tied to the unit; and 3) for larger units.

When PBV assistance is attached to units developed or rehabilitated with other state or locally administered affordable housing funds, the occupancy standards applicable

**ACTIVITY 2023-05: Flexible Subsidy Standards in Project-Based Voucher Admissions**

to those other programs may differ from the subsidy standard used for the PBV program. This creates certain circumstances whereby a family of a particular size or composition, will qualify for a specific unit that was developed with Tax Credit (LIHTC) or HOME program funding, but is not eligible for PBV assistance in that same sized unit. In this case, the family may select to be housed under the standard HCV subsidy standard or may select a smaller unit than the HCV subsidy standard would allow if a smaller unit is available. The family may not select a unit that would lead to an over-crowded unit under the Housing Quality Standards.

AHA also may allow reasonable exceptions for a PBV program if the exception is justified by lack of eligible families to lease larger units (such as four-bedroom units or larger unit sizes). If the unit is being filled by owner referrals, the PBV owner must first contact the AHA to see if it has eligible families on a wait list. If the AHA cannot provide referrals with enough family members, then the PBV owner must certify that a diligent effort to conduct outreach and select eligible families to fill these unit sizes was made and no eligible families were found. This exception may allow the family size to be one less than the minimum number of persons for larger unit sizes. If the AHA does not have enough families on its wait lists for larger units, it must show that all families of the proper number of family members that applied during the last wait list opening were placed on the wait list for that unit size. If that has happened, then the AHA may also refer families for larger units that do not meet the HCV subsidy standards. These families should be pulled from the next smaller bedroom size on the same wait list. If there were larger families that applied during the last wait list opening that were not placed on the wait list, the AHA may decide to reopen the list or go back to the applicants who were not placed on the wait list and place them on the wait list. (The last wait list opening should be within the 3-years for the second option.)

This MTW activity serves the following statutory objectives:

- ☐ Cost effectiveness
- ☐ Self-sufficiency
- ☒ Housing Choice

This MTW activity has the following cost implications:

- ☒ Neutral
- ☐ Increased revenue
- ☐ Decreased revenue
- ☐ Increased expenditures
- ☐ Decreased expenditures

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

- ☐ to all assisted households

**ACTIVITY 2023-05: Flexible Subsidy Standards in Project-Based Voucher Admissions**

☒ only to a subset or subsets of assisted households

**If previous questions is subset.**

A MTW activity can apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households. This MTW activity applies to:

- ☒ New admissions (i.e., applicants) only  
☐ Currently assisted households only  
☐ New admissions and currently assisted households

**If above questions is subset.**

A MTW activity can apply to all family types or only selected family types. This MTW activity applies to:

- ☒ all family types  
☐ only to selected family types

Please select the family types subject to this MTW activity:

- ☐ Non-elderly, non-disabled families  
☐ Elderly families  
☐ Disabled families (to the extent those families are not exempt via a reasonable accommodation)  
☐ Other – another specifically defined target population or populations. The description of this population is:

**If above questions is subset.**

An MTW activity can apply to a tenant-based and or project-based voucher.

- ☐ The MTW activity applies to all tenant-based units.  
☒ The MTW activity applies to all properties with project-based vouchers.  
☐ The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers. The description of which tenant-based units and/or properties with project-based vouchers that will participate in this MTW activity is:

This MTW activity does not require a Safe Harbor Waiver.

This MTW activity does not require a hardship policy.

This MTW activity does require an impact analysis.

The impact analysis does not apply to more than this MTW activity.

## E.2. Agency-Specific Waiver(s) for which HUD Approval has been Received:

For each previously approved Agency-Specific Waiver(s), a set of questions will populate.

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

☒ Yes      ☐ No [If no, question set concludes]

The activities below were submitted with the 2022 MTW Supplement, which has not been approved as of the preparation of this plan but should be approved and implementation started prior to this plan. If HUD does not approve any of the 2022 proposed activities, the below tables will be updated.

ACTIVITY 2022-12: Payment Standard Increases

ACTIVITY 2022-13: Allow Owner Referrals Under PBV Program

ACTIVITY 2022-14: Project-Based Voucher Right Sizing

ACTIVITY 2022-15: Exclude income earned from Guaranteed Basic Income (GBI) Pilot Program

<b>ACTIVITY 2022-12: Payment Standard Increases</b>
The payment standard would be changed at an owner requested rent increase if the change would result in an increase in payment standard to the family. For families where the payment standard would decrease, the same procedures would remain in place (at next annual for family composition change or second annual if an FMR drop).
Waive: 24 CFR 982.505 (c) (4)
This MTW activity serves the following statutory objectives: <input type="checkbox"/> Cost effectiveness <input checked="" type="checkbox"/> Self-sufficiency <input checked="" type="checkbox"/> Housing Choice
This initiative achieves one or more of the 3 MTW above statutory objectives by:  Allowing families to retain more savings when owners increase the rent within payment standard limits and allowing families to remain in units where the market allows for a rent increase between the family's regular reexamination.

**ACTIVITY 2022-12: Payment Standard Increases**

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

- ☐ to all assisted households
- ☒ only to a subset or subsets of assisted households

A MTW activity can apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households. This MTW activity applies to:

- ☐ New admissions (i.e., applicants) only
- ☒ Currently assisted households only
- ☐ New admissions and currently assisted households

A MTW activity can apply to all family types or only selected family types. This MTW activity applies to:

- ☒ all family types
- ☐ only to selected family types

Please select the family types subject to this MTW activity:

- ☐ Non-elderly, non-disabled families
- ☐ Elderly families
- ☐ Disabled families (to the extent those families are not exempt via a reasonable accommodation)
- ☐ Other – another specifically defined target population or populations. The description of this population is:

An MTW activity can apply to a tenant-based and or project-based voucher.

- ☒ The MTW activity applies to all tenant-based units.
- ☐ The MTW activity applies to all properties with project-based vouchers.
- ☐ The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers. The description of which tenant-based units and/or properties with project-based vouchers that will participate in this MTW activity is:

This MTW activity has the following cost implications:

- ☐ Neutral
- ☐ Increased revenue
- ☐ Decreased revenue
- ☒ Increased expenditures
- ☐ Decreased expenditures

The implementation timeline for the initiative is:

Upon approval of MTW Supplement, approval of revised Administrative Plan and training of staff.

<b>ACTIVITY 2022-12: Payment Standard Increases</b>
This MTW activity does require an impact analysis. Please see Payment Standard Increases Impact Analysis.
This MTW activity does not require a hardship policy.
Comments received at the public hearing for the Agency-Specific waiver and the agency's description of how the comments were considered will be inserted after public hearing.
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.
At this time, AHA is waiting on HUD approval to begin implementing activity.
This activity has not been discontinued and is not planned to be discontinued.

DRAFT

**ACTIVITY 2022-13: Allow Owner Referrals Under Project-Based Voucher Program**

Allow owners to refer eligible families for Project-Based Voucher units to the AHA for PBV eligibility determination from an owner-managed wait list. This would implement part of HOTMA that has not been issued for implementation.

Owners would be required to provide documentation and a narrative of 1) how any wait list was built, or families were selected for referral and 2) show that the method in first part met all applicable federal laws including non-discrimination and fair housing requirements. Owner referral would be optional for owners, methods for referral must be pre-approved by the AHA before any referrals would be housed, and the AHA could deny referrals from owners if the AHA determined that the outreach or wait list management was insufficient or had a disparate impact on applicants.

If the owner used the Coordinated Entry System (CES) to provide names the same documentation of compliance with non-discrimination and fair housing requirements must be submitted.

Waiver: 983.251 (c)(1)

This MTW activity serves the following statutory objectives:

- ☒ Cost effectiveness
- ☐ Self-sufficiency
- ☐ Housing Choice

This initiative achieves one or more of the 3 MTW above statutory objectives by: Opening and managing a wait list is a very costly endeavor to make sure that an inclusive method is used to outreach to families. Owners then have additional screening requirements above PBV requirements, so many PBV-eligible applicants are rejected by owners due to other criteria. This would allow owners to market their units with the additional requirements and result in faster leasing of PBV units.

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

- ☐ to all assisted households
- ☒ only to a subset or subsets of assisted households

A MTW activity can apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households. This MTW activity applies to:

- ☒ New admissions (i.e., applicants) only
- ☐ Currently assisted households only
- ☐ New admissions and currently assisted households

A MTW activity can apply to all family types or only selected family types. This MTW activity applies to:

**ACTIVITY 2022-13: Allow Owner Referrals Under Project-Based Voucher Program**

- ☒ all family types  
☐ only to selected family types

Please select the family types subject to this MTW activity:

- ☐ Non-elderly, non-disabled families  
☐ Elderly families  
☐ Disabled families (to the extent those families are not exempt via a reasonable accommodation)  
☐ Other – another specifically defined target population or populations. The description of this population is:

An MTW activity can apply to a tenant-based and or project-based voucher.

- ☐ The MTW activity applies to all tenant-based units.  
☒ The MTW activity applies to all properties with project-based vouchers.  
☐ The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers. The description of which tenant-based units and/or properties with project-based vouchers that will participate in this MTW activity is:

This MTW activity has the following cost implications:

- ☐ Neutral  
☐ Increased revenue  
☐ Decreased revenue  
☐ Increased expenditures  
☒ Decreased expenditures

The implementation timeline for the initiative is: waiting on HUD for activity approval. See revised implementation timeline below.

This MTW activity does require an impact analysis. Please see Owner Referral Impact Analysis.

This MTW activity does not require a hardship policy.

Comments received at the public hearing for the Agency-Specific waiver and the agency's description of how the comments were considered will be inserted after public hearing.

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

The implementation timeline for the initiative is being revised slightly. Full implementation would be delayed because the AHA would first expire applicants on its wait lists before allowing owners to refer except in the case of CES use. In this case, the AHA must outreach to all families on the PBV-SR, PBV-F0-2, or PBV-F3up



<b>ACTIVITY 2022-13: Allow Owner Referrals Under Project-Based Voucher Program</b>
wait lists, as appropriate for the type of unit being filled, to tell applicants of the opportunity of new PBV units and explain how to get evaluated for CES placement at most once a year. Also, the AHA will need to gather and review the documentation from the owner.
This activity has not been discontinued and is not planned to be discontinued.

DRAFT

**ACTIVITY 2022-14: Project-Based Voucher Right Sizing**

Allow families who are under-housed to remain in smaller Project-Based Voucher units as long as the unit is not overcrowded if the under-housed family wishes to remain in the smaller unit. This would not apply to families that are over-housed (housed in a unit larger than the subsidy standards allow). Also, new admissions with a live-in aide would be eligible for a studio or 1-bedroom unit for occupancy.

Waive: 24 CFR 983.260 (a) (1); 24 CFR 983.260 (b) (1) (i); 24 CFR 983.260 (b) (2) (i)

This MTW activity serves the following statutory objectives:

- ☐ Cost effectiveness
- ☐ Self-sufficiency
- ☒ Housing Choice

This initiative achieves one or more of the 3 MTW above statutory objectives by: Many of the units for senior families are studio or 1-bedroom units and a senior with a live-in aide is allowed a second bedroom under the AHA's subsidy standards. Project-based voucher families would be offered the ability to move to a larger Project-Based Voucher unit, if available or to receive a Housing Choice Voucher if the 1-year occupancy is met, but the family may elect to expand their housing choice by remaining in the unit that is smaller than the occupancy standard specifies.

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

- ☐ to all assisted households
- ☒ only to a subset or subsets of assisted households

A MTW activity can apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households. This MTW activity applies to:

- ☐ New admissions (i.e., applicants) only
- ☐ Currently assisted households only
- ☒ New admissions and currently assisted households

A MTW activity can apply to all family types or only selected family types. This MTW activity applies to:

- ☒ all family types
- ☐ only to selected family types

Please select the family types subject to this MTW activity:

- ☐ Non-elderly, non-disabled families
- ☐ Elderly families
- ☐ Disabled families (to the extent those families are not exempt via a reasonable accommodation)

**ACTIVITY 2022-14: Project-Based Voucher Right Sizing**

☐ Other – another specifically defined target population or populations. The description of this population is:

An MTW activity can apply to a tenant-based and or project-based voucher.

☐ The MTW activity applies to all tenant-based units.

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

☐ The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers. The description of which tenant-based units and/or properties with project-based vouchers that will participate in this MTW activity is:

This MTW activity has the following cost implications:

☒ Neutral

☐ Increased revenue

☐ Decreased revenue

☐ Increased expenditures

☐ Decreased expenditures

The implementation timeline for the initiative is:

Upon approval of MTW Supplement, approval of revised Administrative Plan and training of staff.

This MTW activity does require an impact analysis. Please see Right Sizing Impact Analysis.

This MTW activity does not require a hardship policy.

Comments received at the public hearing for the Agency-Specific waiver and the agency's description of how the comments were considered will be inserted after public hearing.

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.

At this time, AHA is waiting on HUD approval to begin implementing activity.

This activity has not been discontinued and is not planned to be discontinued.

**ACTIVITY 2022-15: Guaranteed Basic Income (GBI) Pilot Program**

The City of Alameda has a pilot program, Guaranteed Income Program, to provide a flat monthly cash payment of \$1,000 to approximately 150 low-income City of Alameda households over a two-year period.

Waive: 24 CFR 6.09

This MTW activity serves the following statutory objectives:

- ☒ Cost effectiveness
- ☒ Self-sufficiency
- ☐ Housing Choice

This initiative achieves one or more of the 3 MTW above statutory objectives by:

Allowing families to retain more income for the period of two years without requiring staff to do an interim between triennials.

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

- ☒ to all assisted households
- ☐ only to a subset or subsets of assisted households

This MTW activity has the following cost implications:

- ☐ Neutral
- ☐ Increased revenue
- ☐ Decreased revenue
- ☒ Increased expenditures
- ☐ Decreased expenditures

The implementation timeline for the initiative is:

Upon implementation by the City of Alameda of the program.

This MTW activity does require an impact analysis. Please see GBI Impact Analysis.

This MTW activity does not require a hardship policy.

Comments received at the public hearing for the Agency-Specific waiver and the agency's description of how the comments were considered will be inserted after public hearing.

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.

At this time, AHA is waiting on HUD approval to begin implementing activity.

This activity has not been discontinued and is not planned to be discontinued.

## **F. PUBLIC HOUSING OPERATING SUBSIDY GRANT REPORTING**

Not applicable as the Housing Authority of the City of Alameda does not have Public Housing.

## **G. MTW STATUTORY REQUIREMENTS**

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

Not applicable as the Housing Authority of the City of Alameda does not have a local, non-traditional MTW activity.

### **G.2. Establishing Reasonable Rent Policy.**

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

☒ Yes

☐ No

[If Yes]: please describe the MTW agency's plans for its future rent reform activity and the implementation time line.

The AHA is implementing an alternative reexamination schedule (activity 2022-02) which encourages self-sufficiency by allowing families to retain income increases of less than \$10,000 between triennials. This will be implemented once the MTW Supplement is approved, the Administrative Plan is revised, and staff is trained.

Also, activity 2022-15 encourages self-sufficiency by allowing families to retain income increases from the GBI program. This activity would be implemented upon City implementation of their GBI program.

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

Not applicable as the Housing Authority of the City of Alameda does not have a local, non-traditional MTW activity.

### **G.4. Comparable Mix (by Family Size) – Local, Non-Traditional**

Not applicable as the Housing Authority of the City of Alameda does not have a local, non-traditional MTW activity.

### **G.5. Housing Quality Standards**

Certification is included in MTW Certifications of Compliance for HCV and local, non-traditional program.

## **H. PUBLIC COMMENTS**

H.1.

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

These will be provided as received.

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

These will be provided as available.

If applicable, was an additional public hearing held for an Agency-Specific Waiver and/or Safe Harbor waiver? ☒ Yes ☐ No

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

These will be attached as appropriate.

## **I. EVALUATIONS**

I.1. Please list any ongoing and completed evaluations of the MTW agency's MTW policies, that the PHA is aware of, including the information requested in the table below.

Does the PHA have an agency-sponsored evaluation? ☐ Yes ☒ No

## **J. MTW CERTIFICATION OF COMPLIANCE**

The MTW agency must execute the MTW Certifications of Compliance form and submit as part of the MTW Supplement submission to HUD.

Please see form HUD-50075-MTW for the certification form that will be executed prior to MTW Supplement submission.