

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

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:

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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.

IMPACT ANALYSIS – 2022-14 Project-Based Voucher Right Sizing

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

This does not affect the agency’s finances except as it pertains to staff having to process less Project-Based Voucher (PBV) transfers.

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

This does not change the family contribution as the formula for PBV requires the family to pay a set amount for any unit size based on the family’s income. This activity would allow some PBV families to remain under the PBV rent calculation and not have to convert to the Housing Choice Voucher (HCV) calculation, which sometimes results in an increase in the family portion over the amount paid under the PBV program.

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

This may have a slight impact on PBV waitlists. The AHA attempts to transfer under-housed families within the PBV portfolio before issuing an HCV, so currently families on larger-sized units may have to wait longer because of these transfers, but this activity may shift that wait time to the smaller-sized units. However, there are more smaller-sized units in the AHA’s portfolio, so these waitlists move faster than the larger-sized unit waitlists currently. This may help even out the wait time across bedroom size.

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

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This would not affect the termination rate of families are under-housed families are currently moved between PBV units or given a HCV.

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

This would not affect the utilization rate in the HCV program as the PBV units are already included in that rate.

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

This would increase the housing choice for PBV families by allowing them to remain in the PBV program. Many families on the AHA's program prefer to be housed in PBV units as exemplified by the fact that numerous HCV families applied for PBV waitlists during the last waitlist opening.

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

a) Very Low-Income Requirement

This would not impact the AHA's ability to meet this requirement.

b) Reasonable Rent Policy

This is not affecting the total tenant payment.

c) Substantially the Same Requirement

This would not impact the AHA's ability to meet this requirement.

d) Comparable Mix Requirement

This would not impact the AHA's ability to meet this requirement.

e) Housing Quality Standards (HQS)

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

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

As the family would still have the option to transfer to a correct-sized unit or voucher, this would not result in hardship requests.

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

The AHA will track these families to see if there is a disparate impact, but at this time, there is not enough data to get statistically valid results for the protected classes and this activity as only three (3) families have been under-housed in the last three years.

This MTW activity does not require a hardship policy.

See Section H for a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered. No comments were received specific to this waiver request.