

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

The Alameda Housing Authority (AHA) is seeking to waive 42 USC § 1437f(o)(13)(E)(i), 24 CFR 983.261(a) and 24 CFR 983.261(d) to implement the Project-Based Voucher First Year Moves activity through an Agency-Specific waiver.

This request will allow Project-Based Voucher families to receive a Housing Choice Voucher within the first year of tenancy for Reasonable Accommodation reasons or under the Violence Against Women's Act or upon demonstration of good cause. 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 tenant-based 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 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:

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- ☐ 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.

This MTW activity does require an impact analysis.

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 should not have a large impact on the agency's finances as families in Project-Based Voucher (PBV) units are normally allowed to transfer after one year.

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

This activity will not affect housing costs for families. A family utilizing a Housing Choice Voucher (HCV) may pay more than a family with PBV

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assistance, but the family will not be paying more than other HCV households. At move-in the family's portion could increase from 30% of the family's income to 40% of the family's income, but this change would be covered with the family during the briefing process to allow the family to make a housing choice that is best for the family.

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

There may be a slight increase in the wait time for families on the Housing Choice Voucher waitlist since priority for these vouchers would be given to accommodate tenants relocating out of the PBV program; however, this is how the PBV program already works, so the impact should be negligible over time.

There could also be a slight decrease in the wait times for families on the waitlist for Project-Based Vouchers since more of these units would be made available.

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

This would not affect the termination rate of families.

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

This would not have an effect on utilization rate for the HCV program as the PBV program is part of HCV.

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

This would meet the statutory goal of housing choice by providing tenants with more housing options that are more suitable to their needs or situation.

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

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a) Very Low-Income Requirement

The agency would still be able to meet this requirement as this activity would not impact the selection of applicants as a transfer from PBV to HCV is not considered a new admission.

b) Reasonable Rent Policy

This does not affect the family's calculation of total tenant payment.

c) Substantially the Same Requirement

The agency would still be able to meet this requirement as the families impacted by this activity are currently assisted.

d) Comparable Mix Requirement

The agency would still be able to meet this requirement as the families impacted by this activity are currently assisted.

e) Housing Quality Standards (HQS)

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

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

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

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

Using a chi-squared test for independence, ethnicity for the families on the Housing Choice Voucher (HCV) wait list and the families in the PBV program are independent.

The wait list for the Housing Choice Voucher program contains less families whose head of household (HOH) is a person with a disability than

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those housed under the PBV program. This means there would not be a disparate impact on individuals with disabilities with the activity as this activity benefits the families housed under the PBV program.

Along the same lines, the PBV program houses more families whose HOH is elderly than those families on the HCV wait list, so there is not a disparate impact on families whose HOH is elderly.

If families with five or members are excluded from a chi-squared test for independence, the test states that the family size variable is independent for families on the HCV wait list versus families housed under the PBV program. It is reasonable to exclude these larger families as during the last wait list opening, less larger families applied than the agency had intended to put on the wait list for the PBV program indicating that there are less larger families in the area. The percentages do show that a higher number of larger families are housed in the PBV program than would be expected. The wait list data does not contain the correct information to figure out family status, but the activity is not having an adverse impact on families with a larger number of members. As this activity is not dependent on whether a family has children or not, there should not be an adverse impact on familial status.

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.