

PHA Name : Dover

PHA Code : NH003

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2022

PHA Program Type: Combined

MTW Cohort Number: 1

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

Moving to Work (MTW) is a program that offers Public Housing Authorities (PHAs) the flexibility to design and test various approaches for providing and administering housing assistance. "Waivers" can be used to eliminate or change requirements that restrict progress for participants and for the Housing Authority. Funding can be used where it would be most beneficial. MTW has three primary goals:

1. Cost effectiveness: To reduce costs, Staff's time will be evaluated for opportunities to streamline procedures. Money that can be saved in one area can be used in another since funds are not restricted to one purpose.
2. Self-sufficiency: DHA plans to get rid of drawbacks to families earning more money. For example, without a MTW waiver, when a family's income increases, reporting change of income is required, and ultimately, rent is increased. The DHA plans to encourage employment by reducing multiple rent changes that would normally come with income increases. This will help families budget, knowing their rent will be more stable, and be able to keep extra income for saving or for daily living expenses.
3. Housing choices: By increasing housing stock, partnering with developers and landlords to encourage affordable housing in the community, more housing choices will be made available. We also plan to build on our success of helping families move out of assisted housing to other areas and to become homeowners.

As a new MTW agency, the DHA will turn to residents, participants, other MTW agencies and staff to listen, watch and learn. We will test new activities, evaluate the results, and decide if there is change needed. Staff meetings will be scheduled on a regular basis to discuss impact on time and finances of the Authority. Resident surveys will be conducted regularly. All feedback both formal and informal will be tracked. MTW flexibility at the Dover Housing Authority will be used to benefit the unique needs of our residents, participants, and staff.

Short Term Goals:

The residents and participants of the Dover Housing Authority benefit from some programs already in place. Physical upkeep and building improvements are ongoing and support services are offered through our resident service programs. But guidelines and regulations that come with a "one size fits all" program, cause limiting factors. With the MTW program, the Dover Housing Authority can cut back on certain mandatory requirements for staff and participants so that time, money, and energy can be reallocated where it is most beneficial. It is tempting to make changes to try address to every challenge all at once. Our short-term goal is to begin with changes that will adjust our programs for a significant impact for our residents, our staff, and finances. We will progress, mindfully, with the needs of our residents, participants, and staff in consideration, to "Open Doors to Opportunities".

In the upcoming year, DHA plans to make the following changes:

Rent Reform: allow new exclusions to income calculation and less frequent reexams

Family Self Sufficiency contracts will be modified for those who participate.

Administrative burden will be reduced by streamlining processes. Hardship Policies may be used to help households that may be negatively impacted by MTW activities. Impact Analysis, Rent Reasonableness and Grievance policies will be developed. MTW activities will be evaluated yearly.

Long Term Goals:

"Opening Doors to Opportunities" is the long-term goal, the Vision, of the Dover Housing Authority.

The objectives of the Moving to Work Program: cost effectiveness, encouraging self-sufficiency, and improving housing choices work hand-in-hand with the Goals outlined in the DHA 5-year Plan 2020-2024.

A. Work cooperatively with public and private partners to increase the availability of quality housing opportunities (MTW objective Improving Housing Choices)

B. Improve quality of life for residents and the community. With the MTW flexibilities, we can put money where it is needed most to improve buildings, properties and services will help participants be active in the community. (MTW objective Cost Effectiveness, Self-Sufficiency and Housing Choices)

C. Promote and secure supportive services for eligible persons with limited incomes (MTW objective Self-sufficiency)

D. Ensure Equal Opportunity in Housing (MTW objective Improving Housing Choices)

E. Maintain positive relationships with Board of Commissioners and City Officials. Overseeing financial operations and budgets by the Board plays crucial role in reducing waste (MTW objective Cost Effectiveness). Working with City Officials plays a crucial role in helping increase affordable housing (MTW objective Housing Choices).

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

1. Tenant Rent Policies	
t. Standard Deductions (PH)	Plan to Implement in the Submission Year
u. Standard Deductions (HCV)	Plan to Implement in the Submission Year
v. Alternative Income Inclusions/Exclusions (PH)	Plan to Implement in the Submission Year
w. Alternative Income Inclusions/Exclusions (HCV)	Plan to Implement in the Submission Year
2. Payment Standards and Rent Reasonableness	
c. Rent Reasonableness – Process (HCV)	Plan to Implement in the Submission Year
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Plan to Implement in the Submission Year
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
c. Self-Certification of Assets (PH)	Plan to Implement in the Submission Year
d. Self-Certification of Assets (HCV)	Plan to Implement in the Submission Year
4. Landlord Leasing Incentives	
5. Housing Quality Standards (HQS)	
6. Short-Term Assistance	
7. Term-Limited Assistance	
8. Increase Elderly Age (PH & HCV)	
9. Project-Based Voucher Program Flexibilities	
10. Family Self-Sufficiency Program with MTW Flexibility	
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Plan to Implement in the Submission Year
11. MTW Self-Sufficiency Program	
12. Work Requirement	
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
14. Moving on Policy	
15. Acquisition without Prior HUD Approval (PH)	
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	

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

1.t. - Standard Deductions (PH)
Not Currently Implementing
n/a
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Dover MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is/are hardship requests pending.
0 will be the single standard deduction in the Fiscal Year

1.u. - Standard Deductions (HCV)
Not Currently Implementing
n/a
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Dover MTW agency Received 0 hardship requests

Approved hardship requests
Denied hardship requests
There is\are hardship requests pending.

0 will be the single standard deduction in the Fiscal Year

1.v. - Alternative Income Inclusions/Exclusions (PH)

Income changes do not have to be reported between reexams. Income from assets do not count towards rent calculations. This is part of Rent Refrom.

All 274 Households in DHA Public Housing have an Elderly/Disabled status. Rent Reforms for Elderly/Disabled require a Safe Harbor Waiver. We are requesting this waiver and the description and impact analysis are included in Part D. The Rent Reform Hardship Policy applies to the Safe Harbor Waiver.

This MTW activity serves the following statutory objectives:
Cost effectiveness
Self-sufficiency

This MTW activity serves the following statutory objectives:
Neutral (no cost implications)

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

n/a

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Dover MTW agency
Received 0 hardship requests
Approved hardship requests
Denied hardship requests
There is\are hardship requests pending.

Following inclusions or exclusions will be eliminated, modified, or added.
If a waiver is approved for this activity: Income changes between reexaminations will not have to be reported and rent will remain stable. Income from assets will not be counted in rent calculation. Exceptions outlined in Safe Harbor Waiver.

1.w. - Alternative Income Inclusions/Exclusions (HCV)

This activity requires a Safe Harbor Waiver for Elderly/Disabled HCV/PBV Holders. The activity applies to all other participants without an exception needed.

Income from assets do not count towards rent calculations.

Income changes do not need to be reported until next scheduled reexamination (which will be set biannually). This serves as a work incentive since rent will remain stable until next scheduled reexam.

The following exclusions apply if:

(1) A Household reports "0" income.

Any household that reports "0" income must report income within 10 days of establishing income so that an income calculation interim is conducted, and rent is established.

If at reexam time, "0" income is reported, the household must have an interim in 12 months. The interims will continue at 12-month intervals until income and rent are established. After income and rent are established, the household may go to biannual reexams.

(2) Household Composition changes.

All changes in household composition changes must be reported. At that time, an interim will be conducted, all income counted, and rent adjusted. This may result in an increase or decrease in rent.

(3) Household is eligible for Earned Income Disallowance (EID).

A household whose income increases at reexam may be eligible for an EID. If income increases, for the 1st 12 months, 100% of the increase can be disallowed (not counted towards rent calculation). After 12 months, an interim would be conducted and 50% of the increase can be disallowed. 24 months after the EID started, all the income increase counts towards rent calculation. Biannual reexams can be resumed at that time.

(4) Participants in the Family Self Sufficiency (FSS) Program.

Households that have signed an FSS Contract agree to report all increases in income to the Housing Authority. At that time, an interim will be conducted, and rent adjusted with full the increase calculated. The result will be a higher rent and more money being contributed to the participants Escrow account.

The following apply to this activity:

Impact Analysis: Rent Reform 1

Rent Reform Hardship Policy

This MTW activity serves the following statutory objectives:

Cost effectiveness

Self-sufficiency

This MTW activity serves the following statutory objectives:

Neutral (no cost implications)

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

n/a

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Dover MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

Following inclusions or exclusions will be eliminated, modified, or added.

Income changes between reexams and income from assets are excluded in rent calculation.

2.c. - Rent Reasonableness – Process (HCV)

The PHA will collect and maintain data on market rents in the PHA's jurisdiction. Information sources include newspapers, realtors, market surveys, inquiries of owners and other available sources. The data will be maintained by bedroom size and market areas. Market areas may be defined by zip codes, census tract, neighborhood, and identifiable natural or man-made boundaries. The data will be updated on an ongoing basis and rent information that is more than 12 months old will be eliminated from the database.

The rent for a unit proposed for HCV assistance will be compared to the rent charged for comparable units in the same market area. The PHA will develop a range of prices for comparable units by bedroom size within defined market areas. Units proposed for HCV assistance will be compared to the units within this rent range. Because units may be similar, but not exactly like the unit proposed for HCV assistance, the PHA may make adjustments to the range of prices to account for these differences.

The adjustment must reflect the local market. Not all differences in units require adjustments (e.g., the presence or absence of a garbage disposal may not affect the rent in some market areas).

Tenant Portion of rent is 30% of adjusted income. Adjusted income is gross annual income minus allowed deductions for childcare or medical expenses.

Changes with the MTW approval:

With the new MTW rent reform activities: Reexams will be conducted every 2 years (Alternative Reexam Schedule), increases in income do not have to be reported (Alternative Income Inclusion/Exclusion) and income from assets are not counted towards rent calculation.

Exclusions to the above mentioned apply if

(1) A Household reports "0" income.

Any household that reports "0" income must report income within 10 days of establishing income so that an income calculation interim is conducted, and rent is established.

If at reexam time, "0" income is reported, the household must have an interim in 12 months. The interims will continue at 12-month intervals until income and rent are established. After income and rent are established, the household may go to biannual reexams.

(2) Household Composition changes.

All changes in household composition changes must be reported. At that time, an interim will be conducted, all income counted, and rent adjusted. This may result in an increase or decrease in rent.

(3) Household is eligible for Earned Income Disallowance (EID).

A household whose income increases at reexam may be eligible for an EID. If income increases, for the 1st 12 months, 100% of the increase can be disallowed (not counted towards rent calculation). After 12 months, an interim would be conducted and 50% of the increase can be disallowed. 24 months after the EID started, all the income increase counts towards rent calculation. Biannual reexams can be resumed at that time.

(4) Household participates in the Family Self Sufficiency (FSS) Program.

Households that have signed an FSS Contract agree to report all increases in income to the Housing Authority. At that time, an interim will be conducted, and rent adjusted with full the increase calculated. The result will be a higher rent and more money being contributed to the participants Escrow accounts.

A Safe Harbor Waiver is requested to apply the above rent reform to all HCV participants to include elderly/disabled.

This MTW activity serves the following statutory objectives:

Cost effectiveness

Self-sufficiency

This MTW activity serves the following statutory objectives:

Neutral (no cost implications)

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

n/a

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Dover MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

Following method is used to determine rent reasonableness and the motivations for using a method different from the standard method: Rent is determined as 30% of annual income minus allowable deductions. The standard method is to calculate income or anticipated income at least annually and to include income from assets. Eliminating the requirement of reporting income changes between exams will give households the opportunity to establish a budget with stable rent. If income increases, the household will reap the immediate benefit of reduced rent burden and be able to save or use the increase as needed. Household assets are acquired by saving or investing over time and should be used as a safety net to keep households more independent. Low income households and elderly/disabled households are not able to invest substantial amounts so their assets do not typically grow significantly.

##JOB SPLITTER DYNAMIC##

3.a. - Alternative Reexamination Schedule for Households (PH)

Reexaminations will be reduced from annually to every 2 (two) years for all families.

The objective of this activity is to reduce administrative and residents' time burden Households by reducing the frequency of reexaminations. All 184 DHA PH units are elderly/disabled units. Calculating rent every 12 months for households on fixed incomes, yields little return in rent. Residents who rely on Social Security, for example, may see a modest increase with COLA but medical expenses (which includes insurance premiums) also may go up. The resulting rent change is insignificant when factoring administrative cost.

The following exclusions apply if:

(1) A Household reports "0" income.

Any household that reports "0" income must report income within 10 days of establishing income so that an income calculation interim is conducted, and rent is established.

If at reexam time, "0" income is reported, the household must have an interim in 12 months. The interims will continue at 12-month intervals until income and rent are established. After income and rent are established, the household may begin or resume biannual reexams.

(2) Household Composition changes.

All changes in household composition changes must be reported. At that time, an interim will be conducted, all income counted, and rent adjusted. This may result in an increase or decrease in rent.

(3) Household is eligible for Earned Income Disallowance (EID).

A household whose income increases at reexam may be eligible for an EID. If income increases, for the 1st 12 months, 100% of the increase can be disallowed (not counted towards rent calculation). After 12 months, an interim would be conducted and 50% of the increase can be disallowed. 24 months after the EID started, all the income increase counts towards rent calculation. Biannual reexams can be resumed at that time.

This MTW activity serves the following statutory objectives:

Cost effectiveness

This MTW activity serves the following statutory objectives:

Neutral (no cost implications)

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

n/a
This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
Attached Hardship policy applies to: 3.a. - Alternative Reexamination Schedule for Households (PH) 3.b. - Alternative Reexamination Schedule for Households (HCV)}
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Dover MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
Recertification Schedule is Once every two years
Household may request 2 or more interim recertifications per year.
When there is a change in household composition, an interim will be conducted and rent recalculated as needed.

3.b. - Alternative Reexamination Schedule for Households (HCV)
<p>The objective of this activity is to provide a work incentive for all families and to reduce the time burden on staff and families by reducing the frequency of income reexaminations. The DHA proposes the following changes: Reexaminations will be reduced from annually to 2 (two) years for all families. The following exceptions apply:</p> <p>(1) A Household reports "0" income. Any household that reports "0" income must report income within 10 days of establishing income so that an income calculation interim is conducted, and rent is established. If at reexam time, "0" income is reported, the household must have an interim in 12 months. The interims will continue at 12-month intervals until income and rent are established. After income and rent are established, the household may go to biannual reexams.</p> <p>(2) Household Composition changes. All changes in household composition changes must be reported. At that time, an interim will be conducted, all income counted, and rent adjusted. This may result in an increase or decrease in rent.</p> <p>(3) Household is eligible for Earned Income Disallowance (EID). A household whose income increases at reexam may be eligible for an EID. If income increases, for the 1st 12 months, 100% of the increase can be disallowed (not counted towards rent calculation). After 12 months, an interim would be conducted and 50% of the increase can be disallowed. 24 months after the EID started, all the income increase counts towards rent calculation. Biannual reexams can be resumed at that time.</p> <p>(4) Household participates in the Family Self Sufficiency (FSS) Program. Households that have signed an FSS Contract agree to report all increases in income to the Housing Authority. At that time, an interim will be conducted, and rent adjusted with full the increase calculated. The result will be a higher rent and more money being contributed to the participants Escrow account.</p> <p>(5) Landlord changes rent contract. After the first year of a lease, a landlord can change the rent, according to the HCV HAP Contract. An interim will occur, but the tenant is not required to report income changes.</p>
<p>This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency</p>
<p>This MTW activity serves the following statutory objectives: Neutral (no cost implications)</p>
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
n/a
This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
Attached Hardship policy applies to: 3.a. - Alternative Reexamination Schedule for Households (PH) 3.b. - Alternative Reexamination Schedule for Households (HCV)}
No hardship were requested in the most recent fiscal year.

<p>In the prior year, under this activity, Dover MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.</p>
<p>This MTW activity requires an Impact Analysis. The Impact Analysis is attached.</p>
<p>The Impact Analysis that applies to this MTW activity also applies to the following MTW activities: 3.a. - Alternative Reexamination Schedule for Households (PH) 3.b. - Alternative Reexamination Schedule for Households (HCV)</p>
<p>Recertification Schedule is Once every two years</p>
<p>Household may request 2 or more interim recertifications per year.</p>
<p>Any time there are changes in household members, a report must be made to the Housing Authority. An interim reexam will be required and rent may be increased or decreased at that time.</p>

<p>3.c. - Self-Certification of Assets (PH)</p>
<p>Assets under \$50000 may be self certified. The Housing Authority is requesting to exclude all income from assets through 1.v. , 1.w. and the Safe Harbor Waiver request for Elderly/Disabled.</p>
<p>This MTW activity serves the following statutory objectives: Cost effectiveness</p>
<p>This MTW activity serves the following statutory objectives: Neutral (no cost implications)</p>
<p>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households</p>
<p>n/a</p>
<p>No hardship were requested in the most recent fiscal year.</p>
<p>In the prior year, under this activity, Dover MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.</p>
<p>The dollar threshold for the self-certification of assets is \$50,000.</p>

<p>3.d. - Self-Certification of Assets (HCV)</p>
<p>Assets under \$50000 may be self certified. The Authority is requesting to exclude all income from assets in 1.v. , 1.w. and through a Safe Harbor waiver for Elderly/Disabled.</p>
<p>This MTW activity serves the following statutory objectives: Cost effectiveness</p>
<p>This MTW activity serves the following statutory objectives: Neutral (no cost implications)</p>
<p>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households</p>
<p>n/a</p>
<p>No hardship were requested in the most recent fiscal year.</p>
<p>In the prior year, under this activity, Dover MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.</p>
<p>The dollar threshold for the self-certification of assets is \$50,000.</p>

<p>10.d.HCV - Modify or Eliminate the Contract of Participation (HCV)</p>
<p>Currently FSS graduation is only possible if the Head of Household is employed. With this MTW activity , the employment</p>

of Head of Household, Co-Head or Other Adult will meet the employment status for graduation. Upon graduation, the household may use their escrow money for the down payment of a house, to further education or for other purposes. The Household as a whole will be encouraged towards self-sufficiency. Currently, the household must be off TANF for 12 months. This requirement will be excluded for graduation. Moving towards graduation will allow families to realize goals-through education, home ownership or moving out of assisted housing when the escrow is available to them. Participants cannot miss more than 3 meetings in a row or they will be terminated from the program and forfeit their escrow. This will hold the participants more accountable and is cost effective since time will not be wasted on appointments missed.

This MTW activity serves the following statutory objectives:

Cost effectiveness

Self-sufficiency

Housing choice

This MTW activity serves the following statutory objectives:

Neutral (no cost implications)

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

n/a

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Dover MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

D.	Safe Harbor Waivers.
D.1	Safe Harbor Waivers seeking HUD Approval: Please see attached for Safe Harbor Waivers requested this year.

E.	Agency-Specific Waiver(s).
E.1	Agency-Specific Waiver(s) for HUD Approval: <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, Agency-Specific Waivers may be requested.</p> <p>No Agency-Specific Waivers are being requested.</p>
E.2	Agency-Specific Waiver(s) for which HUD Approval has been Received: <p>MTW Agency does not have approved Agency-Specific Waivers</p>

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2021	\$866,194	\$644,219	\$0	2029-09-30
2022	\$868,106	\$218,326	\$649,780	2030-09-30

G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
Income Level		Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income		
49%-30% Area Median Income		
Below 30% Area Median Income		
Total Local, Non-Traditional Households		0

*Local, non-traditional income data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

G.2	Establishing Reasonable Rent Policy.
MTW agency established a rent reform policy to encourage employment and self-sufficiency	

G.3	Substantially the Same (STS) – Local, Non-Traditional.
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	0 # of unit months
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	0 # of unit months

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

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?

G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.	

Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	
2 Person	
3 Person	
4 Person	
5 Person	
6+ Person	
Totals	0

H.	Public Comment
	Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.
	An additional public hearing was held for an Agency-Specific Waiver and/or Safe Harbor waiver

I.	Evaluations.
	No known evaluations.

Safe Harbor Waiver

Tenant Rent Policies

1.v. Alternative Income Inclusions/Exclusions PH (Elderly/Disabled)

1.w. Alternative Income Inclusions/Exclusions HCV/PBV (Elderly/Disabled)

Safe Harbor 1.v. and 1.w.

- i. Agency must exempt elderly and disabled individuals from this rent determination policy.

Regulations: Housing Act of 1937 and 24 CFR 5

Proposed activities would include allowing the same rent reform for Elderly/Disabled as for all other residents and participants. A.) Income from assets would not be counted for rent calculation; 2) income changes would not be reported between exams.

MTW CHANGE

A.) Income from assets not counted for Elderly/Disabled in PH, HCV or PBV.

Household assets are acquired by saving or investing over time and should be used as a safety net to keep households more independent. Low-income households, elderly/disabled households are not able to invest more in assets their assets do not typically grow substantially.

	Number of elderly/disabled HH	Households with Assets Total more than \$50,000	Households Income from Assets is over \$480 Annually
PH	274	41/274 (15%)	30/274 (11%)
HCV/PBV	308	12/308 (4%)	6/308 (2%)
Totals for all Elderly/Disabled	582	53/582 (9%)	36/582 (6%)

Only 9% of all Elderly/Disabled HH have more than \$50,000 in assets and only 6% get more than \$480 annually from assets.

B.) Income changes do not have to be reported between reexams for Elderly/Disabled Households in PH, HCV or PBV.

Income changes do not need to be reported until next scheduled reexamination (which will be set biannually). This serves as a work incentive for workable families since rent will not change until next scheduled reexam. It will also save time for staff not having to recalculate income and rent multiple times a year.

	Number of elderly/disabled HH	Interims conducted	Total HH with Rent Increases	Total HH with Rent Decreases
PH	274	27	13(5%)	8(3%)
HCV/PBV	308	145	24(8%)	22(7%)
	582	172	37(6%)	30(5%)

The Dover area has a very low unemployment rate currently and many businesses are looking to fill jobs. There are many opportunities for individuals looking to enter or reenter the work force. We anticipate some participants to take advantage of this activity through employment opportunities, but not a significant number.

The following exclusions to this activity apply if:

(1) A Household reports "0" income.

Any household that reports "0" income must report income within 10 days of establishing income so that an income calculation interim is conducted, and rent is established.

If at reexam time, "0" income is reported, the household must have an interim in 12 months. The interims will continue at 12-month intervals until income and rent are established. After income and rent are established, the household may go to biannual reexams.

An interim would be needed to establish income and a tenant portion of rent. After that, the biannual reexams take effect. As of 12/31/2021, no Elderly/Disabled households reported "0" income. There would be no impact on the current residents in this category.

(2) Household Composition changes.

All changes in household composition changes must be reported. At that time, an interim will be conducted, all income counted, and rent adjusted. This may result in an increase or decrease in rent.

The current regulation is the same as above. Since there is no change, there would be no impact anticipated.

(3) Household is eligible for Earned Income Disallowance (EID).

A household whose income increases at reexam may be eligible for an EID. If income increases, for the 1st 12 months, 100% of the increase can be disallowed (not counted towards rent calculation). After 12 months, an interim would be conducted and 50% of the increase can be disallowed. 24 months after the EID started, all the income increase counts towards rent calculation. Biannual reexams can be resumed at that time.

The current regulation is the same as above. Since there is no change, there would be no impact anticipated.

(4) Household participates in the Family Self Sufficiency (FSS) Program.

Households that have signed an FSS Contract agree to report all increases in income to the Housing Authority. At that time, an interim will be conducted, and rent adjusted with full the increase calculated. The result will be a higher rent and more money being contributed to the participants Escrow account.

(5) Landlord changes rent contract for HVC

After the first year of a lease, a landlord can change the rent, according to the HCV HAP Contract. An interim will occur, but the tenant is not required to report income changes.

Impact of Safe Harbor Waiver on Statutory Requirements:

1. **Impact on agency's finances (change in per family contribution)**
Agency will save money by reducing staff hours needed to complete multiple reexams for households as income fluctuates. Family contributions will remain stable or be reduced.
2. **Impact on affordability of housing:**
Affordability will remain the same or increase if the Household earns more.
3. **Impact on waitlist: No impact**
4. **Impact on terminations: No impact**
5. **Impact on occupancy level: No impact**
6. **Impact on 3 statutory goals (Cost effectiveness, self-sufficiency, housing choice)**
Cost Effectiveness: Staff will save time since reexams will be reduced.
Self-sufficiency: households will have more incentive to increase income. Extra income with stable rents means families can budget for unexpected expenses or expenses that occur only periodically, such as car registrations.
7. **Impact on agencies ability to meet statutory requirements. Neutral cost.**
8. **Impact on hardship requests: No impact.**
9. **Across above factors, impact on protected classes: No impact**

The following applies to this activity:

Rent Reform Hardship Policy

Rent Reform Hardship Policy

Hardship Exemptions provide temporary relief to participating households experiencing significant or unexpected, increases in rent burden. Each request will be reviewed and weighed against other local resources available to the family. The result of the review may consist in referral to other local resources, and/or an adjustment in the portion of the family's rent.

This Hardship Policy addresses Rent Reform Policies (PH, PBV, HCV)

Households that experience a decrease in income that is not expected to be short term or nonsignificant, may request an interim to have rent adjusted at any time in between regular examinations. Households with expenses that would allow new deductions may also request an interim.

Process for Agency Review and Determination

The Household:

- A hardship request must be made in writing, stating both the reason for the hardship and the expected duration. With the request, the Household is required to provide documentation of the decreased income or increased expenses. There is no limit for the number of times a household may request an interim under the hardship policy.

The Agency will take the following actions:

- Refer the tenant to Community Action Program or other assistance for immediate and/or short-term assistance.
- Suspend the rent beginning the next month after the request until the agency has determined if the request is warranted.
- The Housing Specialist assigned to the participant's program will determine whether a hardship exists within a reasonable time after the family request.

The standard for this hardship will be if the changes result in a higher rent burden of at least 5% for more than 1 month, if outside assistance is not available and the decrease is not due to seasonal hours. In the case of seasonal work, a temporary hardship waiver may be granted for 3-6 months. After that, an interim may be conducted and if needed, another hardship may be applied for as needed in the future.

If, at a requested interim, income drops to "0" the household must report new income within 10 days of new employment or other income being received. At that time, another interim will take place and rent will be reestablished. If no income is obtained, an interim exam (instead of biannual) will be required every 12 months until income and rent can be established.

If the request does not meet the hardship standard or if proof of hardship is not provided, the agency must resume rent and collect any retroactive rent, if applicable. If an exemption is denied, the resident has the right to a second review through the grievance procedure attached.

Impact Analysis: Rent Reform 1 (1.w. and 3.b.)

- 1) Alternative Income/Exclusions HCV/PBV
Income from assets not included for rent calculation
Income changes not reported between reexams
- 2) Alternative Reexam Schedule-biannual HCV/PBV

Statutory Objectives: Cost-effectiveness, Self-Sufficiency

Neutral cost (no cost implications)

Applies to new admissions and currently assisted households.

Impact Analysis:

INCOME CHANGES NOT REPORTED AT INTERIMS/INTERIMS CONDUCTED BIANNUALLY

The impact of HAP is expected to be increased initially since only decreases in income will be reported. Over time, HAP is expected to be less as households are incentivized to increase income. Increased income will be counted at biannual reexams and rent will be increased at that time as applicable.

Interims shall be conducted apply if:

- (1) A Household reports "0" income.
Any household that reports "0" income must report income within 10 days of establishing income so that an income calculation interim is conducted, and rent is established.
If at reexam time, "0" income is reported, the household must have an interim in 12 months. The interims will continue at 12-month intervals until income and rent are established. After income and rent are established, the household may go to biannual reexams.

As of 12/31/2021, 34 households reported "0" income for HCV and 15 for PBV. With this MTW Activity, the above rule will apply but will still reduce the number of interims needed. The interim is only needed to establish income and a tenant portion of rent. After that, the biannual reexams take effect.
- (2) Household Composition changes.
All changes in household composition changes must be reported. At that time, an interim will be conducted, all income counted, and rent adjusted. This may result in an increase or decrease in rent.

The current regulation is the same as above. No impact.
- (3) Household is eligible for Earned Income Disallowance (EID).
A household whose income increases at reexam may be eligible for an EID. If income increases, for the 1st 12 months, 100% of the increase can be disallowed (not counted towards rent calculation). After 12 months, an interim would be conducted and 50% of the increase can be disallowed. 24 months after the EID started, all the income increase counts towards rent calculation. Biannual reexams can be resumed at that time.

The current regulation is the same as above. No impact.

(4) Household participates in the Family Self Sufficiency (FSS) Program.

Households that have signed an FSS Contract agree to report all increases in income to the Housing Authority. At that time, an interim will be conducted, and rent adjusted with full the increase calculated. The result will be a higher rent and more money being contributed to the participants Escrow account.

The current regulation is the same as above. There are currently 81 households with FSS Contracts. No impact.

(5) Landlord increases rent for HCV unit.

In interim must be conducted according to the HAP Contract but income changes are not calculated.

INCOME FROM ASSETS NOT COUNTED TOWARDS RENT CALCUALTION

Only 12 of 535 HCV/PBV Households have more than \$50,000 is assets Only 6 of 535 get more than \$480 annually as income from assets.

If income from assets is not counted, the impact on overall rents collected is slight since most participants have very few assets.

Staff time will be saved since verifications do not have to be conducted.

Impact of rent reform on Statutory Requirements:

1. **Impact on agency's finances (change in per family contribution)**
Agency will save money by reducing staff hours needed to complete multiple reexams for households as income fluctuates. Family contributions will remain stable or be reduced.
2. **Impact on affordability of housing:**
Affordability will remain the same or increase if the Household earns more.
3. **Impact on waitlist: No impact**
4. **Impact on terminations: No impact**
5. **Impact on occupancy level: No impact**
6. **Impact on 3 statutory goals (Cost effectiveness, self-sufficiency, housing choice)**
Cost Effectiveness: Staff will save time since reexams will be reduced.
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7. **Impact on agencies ability to meet statutory requirements. Neutral cost.**
8. **Impact on hardship requests: No impact.**
9. **Across above factors, impact on protected classes: No impact**

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (07/01/2022), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

MTW PHA NAME

MTW PHA NUMBER/HA CODE

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

Timothy Granfield

Board of Commissioners, Chair

NAME OF AUTHORIZED OFFICIAL

TITLE

SIGNATURE

DATE

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