

**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<sup>2</sup> 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.

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| <b>A.</b>  | <b>PHA Information.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>A.1</b> | <p>PHA Name: <u>Boulder County Housing Authority</u></p> <p>PHA Code: <u>CO061</u></p> <p>MTW Supplement for PHA Fiscal Year Beginning: (MM/DD/YYYY): <u>01/2025</u></p> <p>PHA Program Type: <input type="checkbox"/> Public Housing (PH) only <input checked="" type="checkbox"/> Housing Choice Voucher (HCV) only <input type="checkbox"/> Combined</p> <p>MTW Cohort Number: <u>MTW Flexibility for smaller PHAS II Cohort</u></p> <p>MTW Supplement Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Amended Annual Submission</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>B.</b>  | <b>Narrative.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>B.1</b> | <p><b>MTW Supplement Narrative.</b></p> <p>The Boulder County Housing Authority (BCHA) based in Boulder, Colorado and serves all areas of Boulder County outside the city limits of Longmont and Boulder, including the cities of Lafayette and Louisville, and the towns of Superior, Nederland, and Erie, and all unincorporated areas of the county BCHA has an intergovernmental agreement to also allow current voucher holders to reside within Broomfield County limits. BCHA’s mission is to foster the availability of quality, affordable housing and related housing services for the residents of Boulder County.</p> <p>Our goal is to provide quality, affordable housing and related services to Boulder County residents. We also work with the cities of Boulder and Longmont to increase the availability of affordable homes.</p> <p>In March 2024, thanks to our past record and high-performance status BCHA was chosen as a HUD Moving to Work (MTW) agency under the Flexibilities for Smaller PHAs Cohort II group, which gives us more</p> |

flexibility to make cost-saving and policy changes. This is our first MTW plan, focusing on short-term goals for Year One. We are also planning long-term goals to better serve our community and improve residents' lives.

As we do this planning, we make sure that any of our proposed activities accomplish at least one of the three statutory objectives established by Congress when it created MTW in 1996:

- 1) Reduce cost and achieve greater cost effectiveness in Federal expenditures;
- 2) Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
- 3) Increase housing choices for low-income families.

In our first year, starting in 2025, we will be focusing on making changes primarily to internal administrative policies on how we handle utility allowances, medical deductions, and our project-based voucher program. We will also make some internal staff changes to work more efficiently. We plan to conduct a survey during Year One to understand our residents' needs better, which will help us adjust our plans for Year Two.

In Year Two, we aim to create more opportunities for residents to become self-sufficient and expand housing options. We will also continue with our biennial inspections and review how the methods in which we connect with households for recertification.

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<sup>2</sup> Legacy MTW Agencies are agencies that were designated as MTW as of December 15, 2015

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| <b>C.</b> | <b>MTW Waivers and Associated Activities.</b> |
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|---------------------------------|--|
| <b>C.1 Tenant Rent Policies</b> |  |
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|                                                 |                           |
|-------------------------------------------------|---------------------------|
| <b>1.a., 1.b. - Tiered Rent (PH &amp; HCV)</b>  | Not currently implemented |
| <b>1.c., 1.d. - Stepped Rent (PH &amp; HCV)</b> | Not currently implemented |
| <b>1.c., 1.d. - Stepped Rent (PH &amp; HCV)</b> | Not currently implemented |
| <b>1.e., 1.f. - Minimum Rent (PH &amp; HCV)</b> | Not currently implemented |

|                                                                                      |                                          |
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| <b>1.g., 1.h. - Tenant Payment as a Modified Percentage of Income (PH &amp; HCV)</b> | Plan to Implement in the Submission Year |
|--------------------------------------------------------------------------------------|------------------------------------------|

|                                                                      |            |
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| What percentage of income will equal the Total Tenant Payment (TTP)? | <u>26%</u> |
|----------------------------------------------------------------------|------------|

|                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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| What is the income basis for calculating Total Tenant Payment? | This activity uses adjusted annual income as defined in 24 CFR 5.611 (as required for non-MTW PHAs)<br>This activity uses a different definition of income because we are using the following MTW waivers (check all that apply) <ul style="list-style-type: none"> <li><input type="checkbox"/> 1.r. and/or 1.s. "elimination of deductions"</li> <li><input checked="" type="checkbox"/> 1.t. and/or 1.u. "standard deductions"</li> <li><input type="checkbox"/> 1.v. and/or 1.w. "alternative inclusions and exclusions"</li> </ul> |
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**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**

Description: At reexamination, BCHA will no longer require elderly/disabled households to submit any unreimbursed medical expenses and instead will calculate the TTP at 26% of the monthly income while applying the applicable utility allowance.

Agency goals for MTW Activity: Decrease administrative time required to follow up and secure documents, allowing staff to focus on other priorities. This waiver supports BCHA's larger goal of using MTW flexibility to streamline administrative processes and in the longer term reduce agency costs.

**Which of the MTW statutory objectives does this MTW activity serve?**

Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted elderly and disabled households, all new admissions, and all current voucher participants

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

Yes BCHA is requesting HUD waive safe harbor requirement under 1.h.3

**Does the MTW activity require an impact analysis?**

Yes

**Does this MTW activity require a hardship policy?**

Yes

|                                                                  |                                          |
|------------------------------------------------------------------|------------------------------------------|
| <b>1.i., 1.j. - Alternative Utility Allowance (PH &amp; HCV)</b> | Plan to Implement in the Submission Year |
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| Please describe the alternative method of calculating the utility allowances. Please explain how the method of calculating utility allowances is different from the standard method and what objective the MTW agency aims to achieve by using this alternative | Our third-party service is currently evaluating the utility allowance schedules. The plan is to have two utility allowance schedules for the entire program. By eliminating all the different categories of |
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| method.                                                                                    | gas/electric/propane etc. and building type and instead offering one flat amount for when the household is responsible for paying all utilities based on bedroom size. And then a second utility allowance schedule for when the household is required to pay some but not all utilities, which as well will eliminate all of the different categories and building types and offer one flat amount based on bedroom size.<br><br>This MTW activity applies to all family types.<br><br>This MTW activity applies to all tenant-based units and applies to all properties with project-based vouchers |
| <b>1.k., 1.l. - Fixed Rents/Subsidy (PH &amp; HCV)</b>                                     | Not currently implemented                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>1.m., 1.n. - Utility Reimbursements (PH &amp; HCV)</b>                                  | Not currently implemented                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>1.o. - Initial Rent Burden (HCV)</b>                                                    | Not currently implemented                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>1.p., 1.q. - Imputed Income (PH &amp; HCV)</b>                                          | Not currently implemented                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>1.p., 1.q. - Imputed Income (PH &amp; HCV)</b>                                          | Not currently implemented                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>1.r., 1.s. - Elimination of Deduction(s) (PH &amp; HCV)</b>                             | <b>Input options and instructions</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Which deduction(s) will be eliminated, modified, or added?                                 | (Check all that apply)<br><br><input type="checkbox"/> Dependent allowance<br><input type="checkbox"/> Unreimbursed childcare costs<br><input type="checkbox"/> Other (please explain) the deduction for elderly/disabled households will be eliminated as the TTP will be calculated at a reduced percentage.                                                                                                                                                                                                                                                                                        |
| <b>1.t., 1.u. - Standard Deductions (PH &amp; HCV)</b>                                     | <b>Input options and instructions</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| How much will the single standard deduction be in the Fiscal Year?                         | \$ _____                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>1.v., 1.w. - Alternative Income Inclusions/Exclusions (PH &amp; HCV)</b>                | <b>Input options and instruction</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| What inclusions or exclusions will be eliminated, modified, or added?                      | Not currently implemented                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>C.2 Payment Standards and Rent Reasonableness</b>                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>2.a. - Payment Standards – Small Area Fair Market Rents (FMR) (HCV)</b>                 | Not currently implemented                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>2.b. - Payment Standards – Fair Market Rents (HCV)</b>                                  | Not currently implemented                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>2.c. - Rent Reasonableness – Process (HCV)</b>                                          | Not currently implemented                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>2.d. - Rent Reasonableness – Third-Party Requirement (HCV)</b>                          | Not currently implemented                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>C.3 Reexaminations</b>                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>3.a., 3.b. - Alternative Reexamination Schedule for Households (PH &amp; HCV)</b>       | Not currently implemented                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>3.c., 3.d. - Self-Certification of Assets (PH &amp; HCV)</b>                            | Not currently implemented                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>C.4 Landlord Leasing Incentives</b>                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>4.a., 4.b., 4.c. - Vacancy Loss, Damage Claims, and Other Landlord Incentives (HCV)</b> | Not currently implemented                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>C.5 Housing Quality Standards (HQS)</b>                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>5.a. - Pre-Qualifying Unit Inspections (HCV)</b>                                        | Not currently implemented                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>5.b. - Reasonable Penalty Payments for Landlords (HCV)</b>                              | Not currently implemented                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>5.c. - Third-Party Requirement (HCV)</b>                                                | Not currently implemented                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>5.d. - Alternative Inspection Schedule (HCV)</b>                                        | Not currently implemented                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

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| <b>C.6 Short-Term Assistance</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                           |
| <b>6.a., 6.b. - Short-Term Assistance (PH &amp; HCV)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Not currently implemented |
| <b>C.7 Term-Limited Assistance</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                           |
| <b>7.a., 7.b. - Term-Limited Assistance (PH &amp; HCV)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Not currently implemented |
| <b>C.8 Increase Elderly Age</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                           |
| <b>8. - Increase Elderly Age (PH &amp; HCV)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Not currently implemented |
| <b>C.9 Project-Based Voucher Program Flexibilities (PBV)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                           |
| <b>9.c. - Elimination of PBV Selection Process for PHA-owned Projects without Improvement, Development, or Replacement (HCV)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                           |
| 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                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                           |
| <p><b>Description:</b> BCHA may eliminate the selection process in the award of Project Based Vouchers to properties owned by the agency that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site. A subsidy layering review will still be conducted and all site selection requirements will be followed. Housing Quality Standards (HQS) inspections will be performed by an independent entity according to 24 CFR 983.59 (b) and 983.103 (f). The agency will follow the procedures outlined in Notice PIH 2013-27 where applicable, or its successor. The agency acknowledges the property must be owned by a single-asset entity of the agency per the guidance of PIH notice 2017-21.</p> |                           |
| <p><b>Agency goals for MTW Activity:</b> Increase the number of participating landlords and create increased housing options; create family stability in an environment with support to encourage family self-sufficiency.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                           |
| Which of the MTW statutory objectives does this MTW activity serve?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                           |
| Housing choice                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                           |
| What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                           |
| Neutral (no cost implications)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                           |
| Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                           |
| The MTW activity applies to all assisted households                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                           |
| 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 waiver will be implemented according to agency need.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                           |
| Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                           |
| No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                           |

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| <b>D.</b>  | <b>Safe Harbor Waivers.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>D.1</b> | <p><b>Safe Harbor Waivers seeking HUD Approval:</b><br/>                 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.</p> <p>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</p> <p>Yes</p> |
| <b>E.</b>  | <b>Agency-Specific Waivers.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>E.1</b> | <p><b>Agency-Specific Waivers for HUD Approval:</b></p> <p>None</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|            | <p>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.</p> <p>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p><input checked="" type="checkbox"/> No [If no, skip to E.2]</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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| <b>E.2</b> | <p><b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b><br/>For each previously approved Agency-Specific Waiver(s), a set of questions will populate. Does the MTW agency have any approved Agency-Specific Waivers?</p> <p>Yes</p> <p><input checked="" type="checkbox"/> No</p>                                                                                                                                                            |
| <b>F.</b>  | <b>Public Housing Operating Subsidy Grant Reporting.</b>                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>F.1</b> | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>G.</b>  | <b>MTW Statutory Requirements.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>G.1</b> | <p><b>75% Very Low Income – Local, Non-Traditional.</b></p> <p>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.</p> |

| 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                   | #                                                                        |
| <b>Total Local, Non-Traditional Households</b> | <b>0</b>                                                                 |

\*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.

|                                                                                                   |                                                               |                                       |
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| <b>G.2</b>                                                                                        | <b>Establishing Reasonable Rent Policy.</b>                   |                                       |
| <b>Question</b>                                                                                   |                                                               | <b>Input options and instructions</b> |
| Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency? |                                                               | No                                    |
| <b>G.3</b>                                                                                        | <b>Substantially the Same (STS) – Local, Non-Traditional.</b> |                                       |
| <b>Questions</b>                                                                                  |                                                               | <b>Input options and instructions</b> |

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| Please provide the total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.                        | ____ # of unit months                                                                                      |
| Please provide the total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.           | ____ # of unit months                                                                                      |
| How many units, developed under the local, non-traditional housing development activity, were available for occupancy during the prior full calendar year (by bedroom size)? | Please include only those units that serve households <b>at or below 80% of AMI</b> in the table provided. |

| PROPERTY NAME/ADDRESS | 0/1 BR | 2 BR | 3 BR | 4 BR | 5 BR | 6+ BR | TOTAL UNITS | POPULATION TYPE* | # 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? |
|-----------------------|--------|------|------|------|------|-------|-------------|------------------|------------------------------------------|----------------------------------------------|---------------------------------------------------------------------------------------------|--------------------------------------------------------------------|
| Name/Address          | #      | #    | #    | #    | #    | #     | #           | Type (below)     | #                                        | #                                            | Y/N                                                                                         | \$                                                                 |
| Name/Address          | #      | #    | #    | #    | #    | #     | #           | Type (below)     | #                                        | #                                            | Y/N                                                                                         | \$                                                                 |
| Name/Address          | #      | #    | #    | #    | #    | #     | #           | Type (below)     | #                                        | #                                            | Y/N                                                                                         | \$                                                                 |
| <b>Totals</b>         | #      | #    | #    | #    | #    | #     | #           |                  | #                                        | #                                            |                                                                                             |                                                                    |

\* User will select one of the following from the “Population Type” dropdown box: General, Elderly, Disabled, Elderly/Disabled, Other

If the “Population Type” of is Other is selected, please state the Property Name/Address and describe the population type. [Text box]

\*\* The federal accessibility standard under HUD’s Section 504 regulation is the Uniform Federal Accessibility Standards (UFAS) for purposes of Section 504 compliance. HUD recipients may alternatively use the 2010 ADA Standards for Accessible Design under Title II of the ADA, except for certain specific identified provisions, as detailed in HUD’s Notice on “Instructions for use of alternative accessibility standard,” published in the Federal Register on May 23, 2014 (“Deeming Notice”) for purposes of Section 504 compliance, <https://www.govinfo.gov/content/pkg/FR-2014-05-23/pdf/2014-11844.pdf>. This would also include adaptable units as defined by HUD’s Section 504 regulation (See 24 CFR § 8.3 and § 8.22).

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| <b>G.4</b> | <b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b> |
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In order to demonstrate that the MTW statutory requirement of “maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration” is being achieved, the MTW agency will provide information for its most recently completed Fiscal Year in the following table.

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

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

|            |                                                                                                                                                                                                                                       |
|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>G.5</b> | <b>Housing Quality Standards.</b>                                                                                                                                                                                                     |
|            | Certification is included in MTW Certifications of Compliance for HCV and local, non-traditional program. The public housing program is monitored through physical inspections performed by the Real Estate Assessment Center (REAC). |

|           |                         |
|-----------|-------------------------|
| <b>H.</b> | <b>Public Comments.</b> |
|-----------|-------------------------|

| H.1                                                                                                                            | Input options and instructions |
|--------------------------------------------------------------------------------------------------------------------------------|--------------------------------|
| Please provide copy of all comments received by the public, Resident Advisory Board, and tenant associations.                  | Upload Attachment              |
| Please attach a narrative describing the MTW agency’s analysis of the comments and any decisions made based on these comments. | Upload Attachment              |
| If applicable, was an additional public hearing held for an Agency-Specific Waiver and/or Safe Harbor waiver?                  | Yes<br>No<br>N/A               |
| If yes, please attach the comments received along with the MTW agency’s description of how comments were considered.           | Upload Attachment              |

|            |                                                                                                                                                                                                                                                                                                                  |
|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>I</b>   | <b>Evaluations.</b>                                                                                                                                                                                                                                                                                              |
| <b>I.1</b> | 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. In the box “title and short description,” please write the title of the evaluation and a brief description of the focus of the evaluation. |

| Question                                          | Input options and instructions                    |
|---------------------------------------------------|---------------------------------------------------|
| Does the PHA have an agency-sponsored evaluation? | Yes/No [If Yes]: Please complete the table below. |

**Table I.1 - Evaluations of MTW Policies**

| Title and short description | Evaluator name and contact information | Time period | Reports available |
|-----------------------------|----------------------------------------|-------------|-------------------|
|                             |                                        |             |                   |
|                             |                                        |             |                   |
|                             |                                        |             |                   |

|            |                                                                                                                                                                    |
|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>J</b>   | <b>MTW Certifications of Compliance.</b>                                                                                                                           |
| <b>J.1</b> | The MTW agency must execute the MTW Certifications of Compliance form and submit as part of the MTW Supplement submission to HUD. Certification is provided below. |

**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 (DD/MM/YYYY), 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 identify, 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).*

\_\_\_\_\_  
**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.*

**TABLE 1. GUIDE**

- Core questions - An “X” in this column means that these are the set of core questions that are relevant for every waiver/activity.
- Custom questions - An “X” in this column means that these are questions that are specific to a particular activity. Not every activity will have custom questions.
- Safe Harbor - An "X" in this column means that the activity as described in Appendix 1 of the MTW Operations Notice includes a set of Safe Harbor provisions.
- Impact Analysis - An "X" in this column means that the activity as described in Appendix 1 of the MTW Operations Notice requires the PHA to conduct an impact analysis. This impact analysis must be submitted to HUD via the MTW Supplement; thus, the Supplement should include some statement regarding the requirement and an opportunity for the PHA to upload the impact analysis. The Operations Notice also states that an updated impact analysis must be attached to the MTW Supplement in each subsequent year.
- Hardship Policy - An "X" in this column means that the activity as described in Appendix 1 of the MTW Operations Notice requires the PHA to establish a hardship policy. The hardship policy must be submitted to HUD via the MTW Supplement; thus, the Supplement should include some statement regarding the requirement and an opportunity for the PHA to upload the hardship policy. PHA must still grant reasonable accommodation requests related to all activities even if the hardship policy is not in place.

**TABLE 1. MTW ACTIVITIES QUESTIONS FOR THE MTW SUPPLEMENT**

| Section/Question                                              | Core Questions | Custom Questions | Safe Harbor | Impact Analysis | Hardship Policy |
|---------------------------------------------------------------|----------------|------------------|-------------|-----------------|-----------------|
| <b>1. Tenant Rent Policies</b>                                |                |                  |             |                 |                 |
| a. Tiered Rent (PH)                                           | X              | X                | X           |                 |                 |
| b. Tiered Rent (HCV)                                          | X              | X                | X           |                 |                 |
| c. Stepped Rent (PH)                                          | X              | X                | X           | X               | X               |
| d. Stepped Rent (HCV)                                         | X              | X                | X           | X               | X               |
| e. Minimum Rent (PH)                                          | X              | X                | X           | X               | X               |
| f. Minimum Rent (HCV)                                         | X              | X                | X           | X               | X               |
| g. Total Tenant Payment as a Percentage of Gross Income (PH)  | X              | X                | X           | X               | X               |
| h. Total Tenant Payment as a Percentage of Gross Income (HCV) | X              | X                | X           | X               | X               |
| i. Alternative Utility Allowance (PH)                         | X              | X                | X           |                 |                 |
| j. Alternative Utility Allowance (HCV)                        | X              | X                | X           |                 |                 |
| k. Fixed Rents (PH)                                           | X              | X                | X           |                 |                 |
| l. Fixed Subsidy (HCV)                                        | X              | X                | X           |                 |                 |
| m. Utility Reimbursements (PH)                                | X              |                  |             |                 |                 |
| n. Utility Reimbursements (HCV)                               | X              |                  |             |                 |                 |
| o. Initial Rent Burden (HCV)                                  | X              | X                | X           | X               |                 |
| p. Imputed Income (PH)                                        | X              | X                | X           | X               | X               |
| q. Imputed Income (HCV)                                       | X              | X                | X           | X               | X               |
| r. Elimination of Deduction(s) (PH)                           | X              | X                | X           | X               | X               |
| s. Elimination of Deduction(s) (HCV)                          | X              | X                | X           | X               | X               |
| t. Standard Deductions (PH)                                   | X              | X                | X           | X               | X               |
| u. Standard Deductions (HCV)                                  | X              | X                | X           | X               | X               |
| v. Alternative Income Inclusions/Exclusions (PH)              | X              | X                | X           |                 |                 |
| w. Alternative Income Inclusions/Exclusions (HCV)             | X              | X                | X           |                 |                 |
| <b>2. Payment Standards and Rent Reasonableness</b>           |                |                  |             |                 |                 |
| a. Payment Standards- Small Area Fair Market Rents (HCV)      | X              | X                | X           | X               | X               |
| b. Payment Standards- Fair Market Rents (HCV)                 | X              | X                | X           | X               | X               |

| Section/Question                                                                                                      | Core Questions | Custom Questions | Safe Harbor | Impact Analysis | Hardship Policy |
|-----------------------------------------------------------------------------------------------------------------------|----------------|------------------|-------------|-----------------|-----------------|
| c. Rent Reasonableness – Process (HCV)                                                                                | X              | X                | X           |                 |                 |
| d. Rent Reasonableness – Third-Party Requirement (HCV)                                                                | X              | X                | X           |                 |                 |
| <b>3. Reexaminations</b>                                                                                              |                |                  |             |                 |                 |
| a. Alternative Reexamination Schedule for Households (PH)                                                             | X              | X                | X           | X               | X               |
| b. Alternative Reexamination Schedule for Households (HCV)                                                            | X              | X                | X           | X               | X               |
| c. Self-Certification of Assets (PH)                                                                                  | X              | X                | X           |                 |                 |
| d. Self-Certification of Assets (HCV)                                                                                 | X              | X                | X           |                 |                 |
| <b>4. Landlord Leasing Incentives</b>                                                                                 |                |                  |             |                 |                 |
| a. Vacancy Loss (HCV-Tenant-based Assistance)                                                                         | X              | X                | X           |                 |                 |
| b. Damage Claims (HCV-Tenant-based Assistance)                                                                        | X              | X                | X           |                 |                 |
| c. Other Landlord Incentives (HCV-Tenant-based Assistance)                                                            | X              | X                | X           |                 |                 |
| <b>5. Housing Quality Standards (HQS)</b>                                                                             |                |                  |             |                 |                 |
| a. Pre-Qualifying Unit Inspections (HCV)                                                                              | X              | X                | X           |                 |                 |
| b. Reasonable Penalty Payments for Landlords (HCV)                                                                    | X              | X                | X           |                 |                 |
| c. Third-Party Requirement (HCV)                                                                                      | X              | X                | X           |                 |                 |
| d. Alternative Inspection Schedule (HCV)                                                                              | X              |                  | X           |                 |                 |
| <b>6. Short-Term Assistance</b>                                                                                       |                |                  |             |                 |                 |
| a. Short-Term Assistance (PH)                                                                                         | X              | X                | X           | X               | X               |
| b. Short-Term Assistance (HCV)                                                                                        | X              | X                | X           | X               | X               |
| <b>7. Term-Limited Assistance</b>                                                                                     |                |                  |             |                 |                 |
| Term-Limited Assistance (PH)                                                                                          | X              | X                | X           | X               | X               |
| Term-Limited Assistance (HCV)                                                                                         | X              | X                | X           | X               | X               |
| <b>8. Increase Elderly Age (PH &amp; HCV)</b>                                                                         |                |                  |             |                 |                 |
| <b>9. Project-Based Voucher Program Flexibilities</b>                                                                 |                |                  |             |                 |                 |
| a. Increase PBV Program Cap (HCV)                                                                                     | X              | X                | X           |                 |                 |
| b. Increase PBV Project Cap (HCV)                                                                                     | X              |                  | X           |                 |                 |
| c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV) | X              |                  | X           |                 |                 |
| d. Alternative PBV Selection Process (HCV)                                                                            | X              |                  | X           |                 |                 |
| e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)                                         | X              | X                | X           |                 |                 |
| f. Increase PBV HAP Contract Length (HCV)                                                                             | X              |                  | X           |                 |                 |
| g. Increase PBV Rent to Owner (HCV)                                                                                   | X              |                  | X           |                 |                 |
| h. Limit Portability for PBV Units (HCV)                                                                              | X              |                  | X           |                 |                 |
| <b>10. Family Self-Sufficiency Program with MTW Flexibility</b>                                                       |                |                  |             |                 |                 |
| a. Waive Operating a Required FSS Program (PH & HCV)                                                                  | X              |                  | X           | X               | X               |

| Section/Question                                                                    | Core Questions | Custom Questions | Safe Harbor | Impact Analysis | Hardship Policy |
|-------------------------------------------------------------------------------------|----------------|------------------|-------------|-----------------|-----------------|
| b. Alternative Structure for Establishing Program Coordinating Committee (PH & HCV) | X              | X                | X           | X               | X               |
| c. Alternative Family Selection Procedures (PH & HCV)                               | X              | X                | X           | X               | X               |
| d. Modify or Eliminate the Contract of Participation (PH & HCV)                     | X              |                  | X           | X               | X               |
| e. Policies for Addressing Increases in Family Income (PH & HCV)                    | X              | X                | X           | X               | X               |
| <b>11. MTW Self-Sufficiency Program</b>                                             |                |                  |             |                 |                 |
| a. Alternative Family Selection Procedures (PH & HCV)                               | X              | X                | X           | X               | X               |
| b. Policies for Addressing Increases in Family Income (PH & HCV)                    | X              | X                | X           | X               | X               |
| <b>12. Work Requirement</b>                                                         |                |                  |             |                 |                 |
| a. Work Requirement (PH)                                                            | X              | X                | X           | X               | X               |
| b. Work Requirement (HCV)                                                           | X              | X                | X           | X               | X               |
| <b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>         |                |                  |             |                 |                 |
|                                                                                     | X              | X                | X           |                 |                 |
| <b>14. Moving on Policy</b>                                                         |                |                  |             |                 |                 |
| a. Waive Initial HQS Inspection Requirement (HCV)                                   | X              |                  | X           |                 |                 |
| b. Allow Income Calculations from Partner Agencies (PH & HCV)                       | X              |                  | X           |                 |                 |
| c. Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH & HCV)   | X              |                  | X           |                 |                 |
| <b>15. Acquisition without Prior HUD Approval (PH)</b>                              |                |                  |             |                 |                 |
|                                                                                     | X              |                  | X           |                 |                 |
| <b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>                 |                |                  |             |                 |                 |
|                                                                                     | X              |                  | X           |                 |                 |
| <b>17. Local, Non-Traditional Activities</b>                                        |                |                  |             |                 |                 |
| a. Rental Subsidy Programs                                                          | X              | X                | X           |                 |                 |
| b. Service Provision                                                                | X              | X                | X           |                 |                 |
| c. Housing Development Programs                                                     | X              | X                | X           |                 |                 |

## Instructions for Preparation of Form HUD-50075-MTW, MTW Supplement to the Annual PHA Plan

The instructions below detail how to complete the MTW Supplement. These instructions will not appear in the fillable form.

**Note about file uploads:** PHAs can upload PDF or Word documents. Files should be named with the following naming convention: PHA code, Fiscal Year (FY), and short name for the policy/item. Some examples would be CA789FY21RentHardship for a rent hardship policy, CA789FY21ImpactAnalysis for an impact analysis that is applicable to multiple MTW activities, and CA789FY21MTWCertofCompliance for the MTW Certifications of Compliance.

**A. PHA Information.** All PHAs must complete this section.

**A.1** Include the full **PHA Name, PHA Code, PHA Fiscal Year Beginning (MM/DD/YYYY), MTW Cohort Number, and MTW Supplement Submission Type.**

**B. Narrative.** All MTW agencies must complete this section.

**B.1 MTW Supplement Narrative.**

Provide a written description of how the MTW agency seeks to address the three statutory objectives during the coming year. Those three 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; (3) and to increase housing choices for low-income families.

The narrative provides the PHA an opportunity to explain to the public, and the families that it serves, its MTW plans and goals for the coming Fiscal Year.

**C. MTW Waivers.**

**Core Questions.** All MTW activities found in Section C require responses to the same common questions.

*Narrative.* Describe the activity, the agency's goals for this activity, and, if applicable, how this activity contributes to a larger initiative.

*Statutory Objective.* Indicate which of the MTW statutory objectives this activity serves; each activity may serve one or more objectives. The three statutory objectives are housing choice, self-sufficiency, and cost effectiveness. Check all that apply.

*Cost Implications.* State the cost implications of each activity. Choose the best description of the cost implications based on what is known at the time of completing the MTW Supplement. Indicate which categories best describe the cost implications of the activity from among the following choices: neutral (no cost implications), increased revenue, decreased revenue, increased costs, decreased costs. Check all that apply. For instance, an activity may increase revenue, increase costs, and therefore be cost neutral. Alternatively, an activity may simply increase costs.

*Different versions.* Indicate whether there will be different policies for different household statuses, family types, or locations (public housing developments or HCV properties). If [Yes] is checked, questions will pop up which allow the MTW agency to explain which household statuses, family types, and/or locations will be affected. If [No] is checked, the respondent will move on to the next question. The agency will be able to indicate if a policy is different for one or more of these areas.

For example, if an MTW agency chooses to apply a Tenant Rent Policy to only non-elderly, non-disabled families, and not to the elderly or disabled, then it would check [Yes] and then receive the subsequent items that allow the agency to indicate what types of households and family types are affected by the activity.

*Household status.* MTW Agency's must indicate what type of household to which the activity applies. Household types means the following types: new admissions only, currently assisted households only, or new admissions and currently assisted households.

*Family Types:* Family types mean the following: non-elderly, non-disabled families; elderly families; disabled families; or other specifically defined target populations.

*Location.* The MTW agency indicates if the activity is or will be implemented at all or only at certain locations. 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. For PH, the questions will be about developments and for HCV the questions will be about tenant-based units and properties with project-based vouchers. The agency must check the applicable response for all or specific. If the response is for specific locations, then the agency will be asked to provide the details.

PHAs may develop one comprehensive hardship policy to cover all MTW activities requiring a hardship policy, which would only need to be uploaded once.

*Safe Harbor Waiver.* PHAs must indicate if a Safe Harbor Waiver is needed to implement this policy as described. If yes, then the MTW Agency is asked the following: what is the status of the Safe Harbor Waiver Request? PHAs must indicate if the waiver request is being submitted for review with this submission of the MTW Supplement (see Section D), or if the waiver was previously approved. If the latter is checked (the waiver was previously approved), then the PHA must describe the extent to which the Safe Harbor Waiver is supporting the PHA's goal in implementing this activity.

*Hardship policy.* The MTW Operations Notice requires agencies to adopt written policies for determining when a requirement or provision of the MTW activity constitutes a financial or other hardship for the family. If applicable for the activity, please upload the hardship policy associated with this activity. Hardship policies may be applicable to multiple MTW Activities. Only upload Hardship Policy once if said Hardship Policy applies to multiple Activities. Reference Table 1 for specificity on when a hardship policy is required.

*Modification of hardship policy.* PHAs must indicate if the hardship policy has been modified since the last submission of the MTW Supplement. PHAs must check yes or no. If yes, then the respondent is asked: why has the MTW agency modified the hardship policy? The PHA will use the provided text box to describe the modifications.

Number of hardship requests. PHAs must indicate the number of hardship requests that have been received for each applicable activity in the most recently completed PHA fiscal year.

PHAs are legally required to provide reasonable accommodations to their MTW requirements, provisions, or policies, or any component of those requirements, provisions, and policies, following the same standards and processes that generally apply to reasonable accommodations.

*Impact analysis.* The MTW Operations Notice requires agencies to analyze and put into writing the various impacts of the MTW activity if it is required for the MTW activity. Please upload the impact analysis that has been prepared related to this activity, if applicable. An impact analysis may be applicable to multiple MTW Activities. Only upload Impact Analysis once if said Impact Analysis applies to multiple Activities. Reference Table 1 for specificity on when an impact analysis is required.

*Description of accomplishments or changes in implementation.* Provide a description, based on the Fiscal Year goals as listed in the activity's previous Fiscal Year's narrative, about what has been accomplished or changed during the implementation.

*Discontinuation of activity.* If the PHA selects "Will be Discontinued in the Submission Year" or "Was Discontinued in a previous Submission Year" in the screener, a question will be displayed that asks for an explanation as to why the activity was discontinued or will be discontinued. The PHA should explain why the activity was or will be discontinued. If the activity has already been discontinued, the PHA should include the final outcomes and lessons learned. If the activity was discontinued in a previous submission year, the PHA should state which year the activity was discontinued in.

**Custom Questions.** Some MTW activities require responses to custom questions that are specific only to that activity. Some MTW activities contain no custom questions. Respondents must answer each of the custom questions, which will only appear if the PHA is opting to implement the MTW activity in the coming Fiscal Year.

Information for how to answer each custom question is included in the 'input options and instructions' column for each MTW activity.

## 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 must be provided: a) the name and activity number of the MTW Waiver for which the PHA is seeking to expand the safe harbor, b) the specific safe harbor and its implementing regulation, c) the proposed policy the PHA wishes to implement via this waiver, d) a description of the local issue and why such an expansion is needed to implement the activity, e) an impact analysis, f) a description of the hardship policy for the initiative, 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.

## E. Agency-Specific Waivers.

**E.1: Agency-Specific Waivers Submitted 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, waive a statutory 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).

For each Agency-Specific Waiver(s) request, please provide a title and 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 MTW 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.

A PHA planning to pursue an Agency-Specific Waiver is encouraged to read Section 4.c. of the MTW Operations Notice prior to filling out this section of the MTW Supplement.

**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 agency have any approved agency-specific waivers? If yes, the title previously provided in Section E.1 will prepopulate and ask if there has been a change in how the Agency-Specific Waivers is being implemented from when it was originally approved or if it has been discontinued. For changes, the PHA will need to provide a description of what has changed. If it has been discontinued, the PHA will need to provide a description about the final outcomes and lessons learned, as well as whether a final impact analysis was prepared at the time of discontinuation if one was previously required.

## F. Public Housing Operating Subsidy Grant Reporting

**F.1: Public Housing Operating Subsidy Grant Reporting.** PHAs must fill out this table if it receives public housing Operating Subsidy grant funding from HUD. Only public housing Operating Subsidy grant funding awarded in the year the PHA is designated an MTW agency and beyond must be reported in this table. Additional rows must be added for Federal Fiscal Years beyond 2023, as applicable.

The federal account closing law applies to time-limited funds appropriated by Congress during the annual appropriations act process. For the public housing Operating Fund, PHAs must expend federal funds no more than five (5) years after the period of availability for obligation expires. After this 5-year period, the account closes, and the funds are no longer available for any purpose. For public housing Operating Subsidy grant funding, the period of availability for obligation ends at the end of the fourth Federal Fiscal Year (i.e., the period of availability for obligation of FY 2021 funds ends 9/30/2024). Pursuant to the account closing law, PHAs must expend all Operating Subsidy grant amounts within five years of this date (i.e., for FY 2021 funds, the account will close, and funds will no longer be legally available for any purpose on 9/30/2029).

## G. MTW Statutory Requirements.

**General.** HUD will verify compliance with the statutory requirements G.1, G.3, and G.4 for public housing units and HCV units through HUD systems. In addition, agencies are to report compliance with the same requirements for Local, Non-Traditional

Households in the tables provided in this section. Once HUD systems are capable of capturing this data then this will no longer need to be reported through the MTW Supplement.

**G.1: 75% Very Low Income.** All PHAs must fill out the table in G.1. 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. For instance, a PHA submitting its MTW Supplement to the FY2020 Annual PHA Plan should include its Fiscal Year (FY) 2018 local, non-traditional data since this is the most recently completed Fiscal year. Only local, non-traditional new admissions should be included in the table. If a PHA houses no local, non-traditional households, then zeros must be inputted into the table.

HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW PHA are very low income for public housing and HCV programs through existing HUD systems.

**G.2: Establishing Reasonable Rent Policy.** All PHAs must fill out section G.2. Per the MTW Operations Notice, all activities falling under the Tenant Rent Policies category (Section C.1 of the MTW Supplement) or the Alternative Reexamination Schedule category (Section C.3 of the MTW Supplement), detailed in the Appendix of the MTW Operations Notice, meet the definition of a reasonable rent policy.

MTW agencies are reminded that the Rent Determination section of the PHA Plan should be reflective of MTW reasonable rent policies where applicable. From the PHA Plan: "Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. ([24 CFR §903.7\(d\)](#)).

**G.3: Substantially the Same (STS).** All PHAs must fill out section G.3. The number of local, non-traditional families served must be provided by month for the most recently completed Calendar Year. If a PHA houses no local, non-traditional families, then zeros must be inputted into the table. The additional information on Local, Non-Traditional development units must be provided for each development.

HUD will verify compliance with the STS statutory requirement for public housing and HCV programs through existing HUD systems.

**G.4: Comparable Mix (by Family Size).** All PHAs must fill out section G.4. In order to demonstrate that the statutory objective of "maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration" is being achieved, the PHA will provide family size (i.e., not bedroom size) data in the table for the most recently completed Fiscal Year. For instance, a PHA submitting its MTW Supplement to the FY2021 Annual PHA Plan should include its FY 2019 local, non-traditional data since this is the most recently completed Fiscal Year. If a PHA houses no local, non-traditional household, then zeros must be inputted into the table.

HUD will verify compliance with the comparable mix statutory requirement for public housing and HCV programs through existing HUD systems.

**G.5: Housing Quality Standards.** PHAs are not required to enter any information into section G.5. This statutory requirement is certified to in the MTW Certifications of Compliance form for the HCV and local, non-traditional housing programs. The public housing program is monitored by HUD through the Public Housing Assessment System (PHAS) Physical Subsystem, or successor, despite the MTW PHA being exempt from an overall designation.

## H. Public Comments.

**H.1: Public Comments.** All PHAs are required, per the Annual PHA Plan regulations, to go through a public process prior to submitting the MTW Supplement to HUD. The MTW agency must consider, in consultation with the Resident Advisory Board (RAB) and tenant association, as applicable, all of the comments received at the public hearing. The comments received by the public, RABs, and tenant associations must be submitted by the MTW agency, along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.

As described above, PHAs must submit comments and responses for all Safe Harbor and Agency-Specific Waivers, which are to be held in an additional public meeting.

The public comment process must include the Supplement and all uploaded attachments.

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**I. Evaluations**

**I.1: Evaluations.** The MTW agency should fill in Table I.1, listing each evaluation of the MTW policies and providing contact information for the evaluator, the time period of the evaluation, and the names of available reports. The MTW agency should list internal evaluations that result in reports that could be shared upon request but may leave off evaluations meant for internal use only. The MTW agency should list all third-party evaluations, as applicable.

**J. MTW Certifications of Compliance.**

**J.1: MTW Certifications of Compliance Form.** The format for submission of the required MTW Certifications of Compliance is provided in this Form MTW Supplement. The preamble to the MTW Certifications of Compliance directs the MTW PHA to fill in the beginning of the Fiscal Year for which the certification is being made. This should be provided as the first day of the Fiscal Year to be covered by the Annual PHA Plan (for example, a FY2021 Annual PHA Plan for an MTW PHA with a Fiscal Year of January 1 – December 31, this would be January 1, 2021).

The MTW Certifications of Compliance 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.

The MTW Certifications of Compliance must be submitted to HUD as part of the MTW Supplement for each annual submission and each revised annual submission.

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Public reporting burden for this information collection is estimated to average 6.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB control number. The information collected is required to obtain or retain benefits. The information collected will not be held confidential.

### **BCHA Impact Analysis for MTW Activity –**

BCHA is seeking to waive this safe harbor to allow the households that qualify as elderly or disabled among the following voucher types: HCV, PBV, NED, Mainstream, and FUP to participate in our activity to waive the requirement to submit medical expenses during annual recertification and instead adopt a specific percentage to be used when calculating the TTP. By adopting a percentage to calculate the TTP at 26% of income instead of the current 30% and applicable allowances, BCHA expects a small increase in monthly HAP spending from \$1,253,613 to \$1,269,077, the average TTP for these households would decrease from \$503 to \$485 and this change would likely have a negative impact on 56 out of 444 total households.

BCHA intends to request a waiver from the HUD VASH office in order to allow this same activity be applied to the HUD VASH voucher holders. Upon approval from HUD VASH an additional impact analysis will be included in this plan.

### **PIC Data of 927 Households as of June 2024**

#### **Total households eligible to claim regardless of claim status**

444 households are eligible to claim medical expenses or 48% of the voucher population

- Average income is \$19,156
- Average TTP is \$452 for households eligible to claim medical
- Average TPP is \$503 for all voucher households excluding VASH

#### **Households that claim medical**

137 households or 15% of the total voucher population, or 31% of those eligible to claim that do claim.

- Average income is \$22,891
- Average TTP is \$510
- Average annual medical expenses submitted \$2,697

70 households have medical expenses exceeding 10% of their income

- 18 households have medical expenses between 20-54% of their income
- 9 households claim medical expenses over 30%
- 1 household claims 80% of income as medical

20 are in special purpose vouchers excluding VASH, all are considered eligible citizens,

#### **Race and Ethnicity Data:**

- 13 identify as Hispanic households, and
- 5 – Black households
- 1 – American Indian/Alaskan Native
- 1 – Asian
- 0 – Native Hawaiian/Other Pacific Islander

- 130 – White

**Households that are eligible to claim medical but don't**

307 households or 33% of the voucher population, or 69% of those eligible to claim but don't

- Average income is \$17,489
- Average TTP is \$426

62 are in special purpose vouchers, 4 are considered prorated/mixed status households

**Race & Ethnicity Data:**

- 56 identify as Hispanic Households and
- 16 – Black
- 7 – American Indian/Alaskan Native
- 8 – Asian
- 1 – Native Hawaiian/Other Pacific Islander
- 275 – White



# Housing Authority

3400 N. Broadway • Boulder, Colorado 80304 • Tel: 303.441.3929 • Fax: 720.564.2283 • [www.BoulderCountyHousing.org](http://www.BoulderCountyHousing.org)

August 12, 2024

Boulder County Housing Authority #CO061  
PO BOX 471  
Boulder, CO 80306

Re: Request to HUD MTW Program To Waive Safe Harbor Policy

- (a) BCHA is seeking HUD approval to waive the safe harbor policy for MTW activity 1.h Tenant Payment as a Modified Percentage of Income (HCV)—The agency may modify the percentage of income used in the TTP calculation. Tenant Payment as a Modified Percentage of Income (HCV)—Certain provisions of sections 3(b)(4)-(5) and 8(o)(2)(A)-(C) of the 1937 Act and 24 CFR 5.609, 5.611, and 982.516.
- (b) Safe Harbor 1.h.iii Agency must exempt elderly and disabled families from rent policy.
- (c) Proposed MTW activity: BCHA is seeking to eliminate the submission of medical receipts for allowance calculations and instead proposing to calculate households that qualify as elderly and disabled TTP at 26% of their adjusted income.
- (d) As of June 2024 BCHA has 927 households on the voucher program (excluding VASH) and 444 of those households or 48% are eligible to claim medical expenses but only 137 actually do. The process for submitting medical expenses deductions is arduous to both the voucher holders and staff. The average time to process medical expenses for calculation of annual income is 2 hours of the households that have excessive medical expenses exceeding 20% of their income the average time for staff to process expenses for calculation of annual income is 6 hours. This equates to 354 hours of staff time a year dedicated just to reviewing and processing medical expenses. The amount of work required of the households to record, track, store and submit their paperwork is very similar and one area we have received multiple complaints on with little return in a lot of the cases. By implementing this MTW activity we would be saving a significant amount of administrative efforts that could be redirected into the development of additional work that would directly benefit the voucher holders.
- (e) Impact analysis – see attached
- (f) Hardship policy – see attached
- (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.

## **BCHA Hardship Policy for MTW Initiatives**

The BCHA Hardship Policy is designed to address:

### **A. Elimination of Deductions**

BCHA is waiving the elderly/disabled standard HUD deduction and

Under the hardship policy BCHA will provide phased in relief for households who experience more than a \$25 increase in rent at the first annual recertification after the MTW initiative begins. If the household qualifies for a hardship request then BCHA will process a phased in relief over the next two annual recertifications.

- 1<sup>st</sup> Year: BCHA will use 100% of the amount medical calculations from the last annual recertification to calculate the tenant rent portion.
- 2<sup>nd</sup> Year: BCHA will use 50% of the amount of medical calculations from the last annual recertification to calculate the tenant rent portion. \*if 50% is less than BCHA's MTW calculation than the hardship policy will no longer apply and the household's portion will be calculated using the MTW deduction policy.

All hardship requests must be made in writing, stating both the reason for the hardship and the expected duration.

In order to qualify for hardship exemptions, households must meet all of the criteria listed below:

1. The household is in compliance with all the program rules and regulations.
2. The household does not owe BCHA any money or is current with a re-payment agreement.
3. The household must have been admitted to the program prior to January 1, 2025.
4. The household must experience an increase of \$25.00 or more in monthly rent as a direct result of the MTW rent reform initiatives.
5. The household requested the hardship waiver within the deadline set by BCHA. Households have 10 business days from the date of their "Notice of Change" letter in which to request an Informal Hearing and/or Hardship Review.

### **Approval Process for Hardship Requests**

- Households who meet the criteria listed above may mail, fax, or e-mail their request to their Housing Specialist who will review the request promptly determine if the household is eligible and then forward the result and copy of the last annual recertification medical deduction calculation that occurred prior to January 1, 2025 with the tenant file to the supervisor.
- Supervisor approves the new rent if there are no other issues. If there are other issues, the supervisor will conduct further review and consult with Housing Programs Manager.

### **Hardship Relief**

Households who qualify and receive waiver approval may pay their portion of rent based on the calculation under HUD regulations until their next recertification or relocation. At the next annual

recertification, or relocation, whichever comes first, the household will automatically be subject to the rent reform initiatives.

Note: Each household is only eligible for one term of relief for each initiative and if the household qualifies for more than one relief at any given recertification (annual or interim), the reliefs will be calculated concurrently.