

# PHA Name : Hibbing

**PHA Code :** MN004

**MTW Supplement for PHA Fiscal Year Beginning :** (MM/DD/YYYY): 10/1/2022

**PHA Program Type:** Public Housing (PH) only

**MTW Cohort Number:** 1

**MTW Supplement Submission Type:** Annual Submission

## **B. MTW Supplement Narrative.**

The Housing and Redevelopment Authority of Hibbing (HRA) is committed to creating a community where residents thrive. As a newly-designated Moving to Work (MTW) agency, the HRA has the flexibility to create new ways to help families succeed.

The HRA will become a more innovative and effective partner for the community as an MTW agency. The HRA will constantly ask residents and all other stakeholders to help it identify what is working in local public housing and what could be improved.

After listening and researching, the HRA determined that the top long-term goal of the agency's MTW programming is to incentivize, encourage and reward resident economic self-sufficiency. This means helping nonelderly and nondisabled households successfully graduate from public housing on a reasonable timeline. Helping resident families reach their dreams both lifts up the community and allows the HRA to more quickly help those families on wait lists.

In the short term, the HRA is planning to implement four policies towards this goal of self-sufficiency for 2021. First, a new rent structure will allow residents to earn and save more of their money. Next, a new educational program with a dedicated advocate will provide specialized resources for success. Additionally, an improved work requirement will take the place of the community service requirement and allow residents to count activities that invest in themselves. Lastly, a reasonable limit on years of housing eligibility will help households realistically plan for graduation. All four of these policies will exempt the elderly and/or disabled.

The HRA will also implement one policy in 2021 to increase cost effectiveness. Less frequent recertification of incomes, especially of populations with stable incomes, will save staff time and allow the agency to focus more resources on other activities that serve residents.

No policy for increasing housing choice is proposed for 2021. The HRA will continue to work with the HRA of Virginia, Minnesota, to help residents access Section 8 housing vouchers for the area as needed.

These five (5) total proposed policies are the HRA's first efforts to improve resident well-being as an MTW agency. They can be modified or discontinued in future years as the agency learns from experience and resident feedback.

The vision of the HRA is to use these and all future policies to transform Hibbing public housing from merely a safety net into a trampoline for all residents.

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

<b>1. Tenant Rent Policies</b>	
a. Tiered Rent (PH)	Not Currently Implemented
c. Stepped Rent (PH)	Plan to Implement in the Submission Year
e. Minimum Rent (PH)	Plan to Implement in the Submission Year
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
m. Utility Reimbursements (PH)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Not Currently Implemented
t. Standard Deductions (PH)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
<b>2. Payment Standards and Rent Reasonableness</b>	
<b>3. Reexaminations</b>	
a. Alternative Reexamination Schedule for Households (PH)	Plan to Implement in the Submission Year
c. Self-Certification of Assets (PH)	Plan to Implement in the Submission Year
<b>4. Landlord Leasing Incentives</b>	
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	
<b>5. Housing Quality Standards (HQS)</b>	
<b>6. Short-Term Assistance</b>	
a. Short-Term Assistance (PH)	Not Currently Implemented
<b>7. Term-Limited Assistance</b>	
a. Term-Limited Assistance (PH)	Plan to Implement in the Submission Year
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	
Increase Elderly Age (PH & HCV)	Not Currently Implemented
<b>9. Project-Based Voucher Program Flexibilities</b>	
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
a.PH Waive Operating a Required FSS Program (PH)	Not Currently Implemented
b.PH Alternative Structure for Establishing Program Coordinating Committee (PH)	Not Currently Implemented
c.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
d.PH Modify or Eliminate the Contract of Participation (PH)	Not Currently Implemented
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
<b>11. MTW Self-Sufficiency Program</b>	
a.PH Alternative Family Selection Procedures (PH)	Plan to Implement in the Submission Year
b.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
<b>12. Work Requirement</b>	
a. Work Requirement (PH)	Plan to Implement in the Submission Year
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
<b>14. Moving on Policy</b>	
b.PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented
c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented

**17. Local, Non-Traditional Activities**

a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented
c. Housing Development Programs	Not Currently Implemented

**C. MTW Activities Plan that Hibbing Plans to Implement in the Submission Year or Is Currently Implementing****1.c. - Stepped Rent (PH)**

The HRA is proposing a dynamic rent structure that will help nonelderly and nondisabled households build their savings. A majority of households will experience a decrease in their rent for the first two years of this structure. This will allow residents, especially those emerging from crisis, to save more of what they earn. Over time, the rent will gradually approach fair market rates. The rent schedule is complete in seven years.

This rent structure will apply to all current eligible households (nonelderly, nondisabled) and all future eligible households. All current households will begin at "Year 1" of the rent structure, regardless of previous years of residency. This rent structure will also be combined with the new biannual recertification timeline, in which a tenant who does not require any hardship exemption has their income recertified only during years 1, 3, 5 and 7.

Year of Residency Rent Determination

1 20% of Gross Income or Minimum Rent, Whichever is Higher

2 20% of Gross Income or Minimum Rent, Whichever is Higher

3 20% of Newly Certified Gross Income or Minimum Rent, Whichever Is Higher

4 20% of Gross Income (No New Recertification) + 4% Increase of Fair Market Rent Determined by HUD for Applicable Area (4% of 2021 Duluth MSA FMR 1 Bedroom: \$26.84)

5 25% of Newly Certified Gross Income + 4% Increase of Fair Market Rent Determined by HUD for Applicable Area

\*\*\*The resident reapplies for years 6 and 7 to cause an in-depth discussion with the MTW Coordinator about future goals, readiness for the coming increases, current challenges, and any resources or hardship exemptions needed before graduation after year 7.\*\*\*

6 25% Certified Gross Income (No New Recertification) + 4% Increase of Fair Market Rent Determined by HUD for Applicable Area

7 32% of Newly Certified Gross Income + 4% Increase of Fair Market Rent Determined by HUD for Applicable Area

This rent structure will encourage the family to gradually grow both their earnings and savings to prepare for graduation from public housing. As a result, this activity is a crucial part of the larger MTW initiative to support resident self-sufficiency.

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

This MTW activity serves the following statutory objectives:  
Decreased revenue

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:  
New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).  
The MTW activity applies only to selected family types

Non-elderly, non-disabled families are subjected to this MTW activity.

This MTW activity requires a Hardship Policy. The Hardship Policy is attached.

Attached Hardship policy applies to: 1.c. - Stepped Rent (PH)  
1.e. - Minimum Rent (PH)}

No hardship were requested in the most recent fiscal year.

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

This MTW activity requires an Impact Analysis. The Impact Analysis is attached.

The Impact Analysis that applies to this MTW activity also applies to the following MTW activities:  
1.c. - Stepped Rent (PH)  
1.e. - Minimum Rent (PH)

The stepped rent is structured to follow a term limit of seven years.

Every eligible family (nonelderly and nondisabled) will have their initial monthly rent calculated by taking one fifth (20%) of their annual gross income and dividing it across 12 months. This rent will continue unchanged for the first two years of the structure.

The family yearly income will then be recertified during the third year of the rent structure, but the rent calculation will continue to be 20% of gross annual income.

In the fourth year, a flat amount will be added to rent. This amount will be calculated by taking 4% of the HUD Fair Market Rate for the corresponding unit size in the MSA that year.

In the fifth year, the family income will be recertified and rent will be calculated at one quarter (25%) of gross annual income. The flat amount of 4% HUD FMR will also be added to rent once again. For example, in 2021 this flat amount for 1 bedroom would be \$26.84. This calculation is repeated again in the sixth year of the structure.

In the seventh and final year of the structure, the family income is recertified for the last time and rent is calculated at 32% of annual gross income. The flat HUD FMR amount is also added.  
Please see the attached stepped rent schedule.

If a household progresses all the way through the stepped rent schedule,

Other\Not Applicable.

Families that reach year seven of this rent schedule will graduate from public housing as they have reached the end of the term limit.

### 1.e. - Minimum Rent (PH)

The HRA proposes a new minimum monthly rent of \$98, an increase from the current minimum rent of \$50. This is calculated by totaling 12 hours (for example, two shifts of 6 hours) at the 2021 Minnesota small business minimum wage of \$8.21

The purpose of this increase in rent floor is to incentivize eligible households to maintain their source of earnings as the rent gradually rises throughout the new rent schedule. Housing experts and tenants explained to the agency that some households, nervous about experiencing an increase of rent, may attempt to drop all income sources right before a scheduled recertification. To encourage the family not to interrupt earnings and savings, the agency believes a higher minimum rent is necessary to make this tactic less appealing.

It is in the best interest of the family, the agency and the community to keep households on track towards graduation through the rental structure. The goal is to help families prosper in a way that they consistently earn beyond what would qualify for the minimum rent. This contributes to the larger MTW initiative of graduating families from public housing to self-sufficiency.

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

This MTW activity serves the following statutory objectives:  
Increased revenue

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:  
New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).  
The MTW activity applies only to selected family types

Non-elderly, non-disabled families are subjected to this MTW activity.

This MTW activity requires a Hardship Policy. The Hardship Policy is attached.

No hardship were requested in the most recent fiscal year.

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

This MTW activity requires an Impact Analysis. The Impact Analysis is attached.

minimum rent or minimum Total Tenant Payment (TTP) - \$98

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

The HRA proposes a new reexamination schedule for all households. Nonelderly and nondisabled families will have their income recertified once every two (2) years. Elderly and/or disabled families will have their income recertified once every three (3) years.

The goal of this activity is to reward working families who earn more towards graduation from public housing. Current tenants have explained to the agency that the current reexamination schedule disincentivizes increasing earnings. The required reexamination and subsequent rise in rent soon after increased income has caused some residents to forgo work

opportunities that would increase income. The agency is excited to help families understand that under the new system, rent will remain the same when the family increases income until the next scheduled reexamination, allowing the family to earn and save more while enjoying rent predictability for longer periods of time. This will be an important activity in the larger agency initiative of fostering self-sufficiency.

The agency also anticipates that less frequent reexaminations of elderly and/or disabled households, a population with relatively stable incomes over time, will save resident time from unnecessary reexaminations. Additionally, fewer reexaminations will free HRA staff to dedicate more time and resources to other ways of serving residents. This will increase the cost effectiveness of how the agency uses staff.

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

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

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

This MTW activity requires a Hardship Policy. The Hardship Policy is attached.

No hardship were requested in the most recent fiscal year.

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

This MTW activity requires an Impact Analysis. The Impact Analysis is attached.

Recertification Schedule is Other  
Reexaminations will be conducted every two (2) years for non-elderly and non-disabled families, and every three (3) years for elderly and/or disabled families.

Household may request 1 interim recertifications per year.

The agency will make the MTW Coordinator, a staff social worker, a welcoming resource for all households. Families and/or households will be familiar with the Coordinator as he or she will work often with all residents. Families should first contact the MTW Coordinator, who will facilitate conversations between the resident and the agency staff about the situation. The Coordinator, HRA staff and resident(s) will then work together to devise an appropriate solution to the situation, consulting the relevant sections of the ACOP and MTW Hardship Policies as necessary.

### 3.c. - Self-Certification of Assets (PH)

The HRA will allow residents to self-certify assets up to \$50,000. This is a cost effectiveness measure that will allow more staff time to be dedicated towards other ways of serving residents than routinely inspecting assets.

This MTW activity serves the following statutory objectives:  
Cost effectiveness

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

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

No hardship were requested in the most recent fiscal year.

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

The dollar threshold for the self-certification of assets is \$50,000.

### 7.a. - Term-Limited Assistance (PH)

The HRA is proposing a term limit of seven (7) years at maximum for nonelderly and nondisabled residents. The goal of this activity is to help residents plan their graduation from public housing in a clear, tangible and reasonable timeline. MTW housing agencies across the country have instructed the HRA that term limits are a crucial part of any larger initiative to support resident self-sufficiency.

Regardless of years on program, all nonelderly and nondisabled tenants will begin their seven years of eligibility following implementation of these waivers in 2021. This seven year limit applies to the cumulative years an individual has lived in HRA properties, even if not consecutively. Residents who are within seven years of elderly age (62) following implementation in 2021 are exempted from the term limits.

The HRA is committed to creating a culture of empowerment that is focused on graduation of the resident to independence. The HRA will ensure the MTW educational programming and MTW Coordinator position are designed with resident needs in mind, and constantly updated to reflect resident feedback. No resident will be allowed to arrive at the end of their term limit unprepared for graduation. Beginning in the fifth year, residents will be required to meet with the Coordinator and reapply for the next year to cause a discussion about the goals of the resident and remaining needs before graduation.

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

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

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:  
New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).  
The MTW activity applies only to selected family types

Non-elderly, non-disabled families are subjected to this MTW activity.

This MTW activity requires a Hardship Policy. The Hardship Policy is attached.

No hardship were requested in the most recent fiscal year.

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

This MTW activity requires an Impact Analysis. The Impact Analysis is attached.

The following is how households will be supported to prepare for the end of assistance: The HRA will require that all households eligible for term limits are enrolled in the HRA EMPOWER program. This educational curriculum will be overseen by the HRA MTW Coordinator, a full-time staff position dedicated to helping residents prepare for the end of assistance. The MTW Coordinator will work with community stakeholders and residents to develop a program that truly empowers residents to reach their dreams. Residents will also be required to meet regularly with the MTW Coordinator to discuss individual needs and barriers.

104 households are currently subject to this policy.

### **11.a.PH - Alternative Family Selection Procedures (PH)**

To support residents in their journey to graduation from public housing, the HRA is proposing the EMPOWER Program. The EMPOWER Program, as the name makes clear, is dedicated to empowering residents with the tools and resources they need to thrive.

All non-elderly and non-disabled tenants will be required to enroll in the EMPOWER program as a condition of tenancy. The HRA MTW Coordinator will oversee the development and implementation of the EMPOWER Program. New



admissions will be required to meet with the Coordinator within 30 days of moving in to discuss the EMPOWER program and begin the first requirements.

The Coordinator will work closely with the various community stakeholders of the HRA MTW coalition to ensure residents are offered the most useful resources. For example, EMPOWER Program members will be required to take a free class on basic banking and personal finance. As residents progress through the program and approach graduation, the Coordinator will meet more frequently with each resident to understand what tools they need from the EMPOWER program to meet their own personalized goals. The EMPOWER Program will include classes both on private home ownership and fair market rentals, which residents can choose based on their preferences for their life after public housing.

The HRA will continue to rely on the expertise of other MTW agencies with similar programs and on resident feedback to update and improve the EMPOWER Program. The EMPOWER Program will be at the heart of the agency efforts to prepare residents for graduation to self-sufficiency.

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

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

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:  
New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).  
The MTW activity applies only to selected family types

Non-elderly, non-disabled families are subjected to this MTW activity.

No hardship were requested in the most recent fiscal year.

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

MTW Self-Sufficiency policy is mandatory for the following  
The HRA MTW Self-Sufficiency Program, the EMPOWER Program, will be a condition of tenancy for all individual residents who are between 18 and 62 years old and are not disabled.

The offerings of the EMPOWER Program will be open to all residents, but the program will seek to first ensure every nonelderly and nondisabled resident is adequately served. This is because nonelderly and nondisabled residents are eligible for term limits and the new dynamic rent structure. The tools of the EMPOWER Program are designed to first help these residents successfully progress through these schedules.

All check-in meetings and educational components of the EMPOWER Program that are mandatory will be clearly communicated in advance by the MTW Coordinator to eligible residents. A resident who misses a mandatory event of the EMPOWER Program will receive a "First Strike" letter, which explains what the resident missed and why it is critical to work with the MTW Coordinator in advance to reschedule if necessary. A second missed mandatory event without explanation will result in a "Second Strike" letter, including a lease violation. Lastly, a third missed mandatory event will be grounds for the HRA to consider termination.

#### **12.a. - Work Requirement (PH)**

The HRA is proposing a work requirement of ten (10) hours per week for all non-elderly and non-disabled residents. The HRA will use discretion to allow acceptable substitutes for employment, including education, mental or physical

rehabilitation, child care, and job search time. Residents who are in compliance with this requirement are exempted from any Community Service requirements. Residents who are pregnant or the primary caretaker of a child under the age of 6 are also exempted from the work requirement.

The goal of this activity is to encourage residents to invest in themselves. Unlike the Community Service requirements, these ten hours can and should be spent on activities that help the resident prepare themselves for self-sufficiency. The agency will work with the MTW Coordinator to understand what is an appropriate activity towards this goal for each individual resident. Activities as part of the EMPOWER Program or otherwise approved by the MTW Coordinator will also count towards the ten hour weekly requirement.

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

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

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:  
New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).  
The MTW activity applies only to selected family types

Non-elderly, non-disabled families are subjected to this MTW activity.

This MTW activity requires a Hardship Policy. The Hardship Policy is attached.

No hardship were requested in the most recent fiscal year.

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

This MTW activity requires an Impact Analysis. The Impact Analysis is attached.

The following counts as work under this activity: Employment (Full or Part Time, Including Seasonal)

Internships

Apprenticeships

Job Shadowing

Therapy or Rehabilitation (Chemical Dependency, Mental Health, Physical Injury, etc.)

Job Skills Training

Full or Part Time School

Activities for the EMPOWER Program or Otherwise Approved Events by HRA

--OR--

Any activity not listed here that a resident can demonstrate is a positive investment in their ability to be self-sufficient. Once approved by the MTW Coordinator, the resident can apply it to their weekly requirement.

The following is how will the MTW agency monitor compliance: The MTW Coordinator will oversee compliance by discussing it with each tenant during their regular check-in meetings through the EMPOWER Program. The Coordinator will also work with HRA rental staff and community partners to track compliance of each resident.

The following supportive services are offered to support households: All households in the EMPOWER Program should consider the MTW Coordinator their advocate. Any tenant who is unsure of what activity they could pursue to fulfill this requirement will be encouraged to meet with the Coordinator. If a resident struggles to find an activity, the Coordinator will work to connect the resident with community partners that offer employment, education or other qualifying opportunities.

The HRA will also publish a list of qualifying activities each month in the newsletter and online to provide all residents with further options.

The following is how the agency address noncompliance with the work requirement policy: Similar to the EMPOWER Program discipline policy, noncompliance with this work requirement will be addressed through a "3 Strike" rule. Residents who are found not to comply with the requirement will first receive a written warning from the HRA with an explanation for the requirement. Residents who are found in noncompliance a second time, without exemption or hardship granted, will receive a lease violation and a meeting with the MTW Coordinator and ED to discuss how the HRA can help the resident meet the requirement. A third instance of noncompliance leaves the tenant liable to termination.

99 households are currently subject to the policy.

0 households were sanctioned for non-compliance with the work requirement in the most recently completed PHA fiscal year.

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

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

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

<b>Federal Fiscal Year (FFY)</b>	<b>Total Operating Subsidy Authorized Amount</b>	<b>How Much PHA Disbursed by the 9/30 Reporting Period</b>	<b>Remaining Not Yet Disbursed</b>	<b>Deadline</b>
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<b>G.</b>	<b>MTW Statutory Requirements.</b>	
<b>G.1</b>	<b>75% Very Low Income – Local, Non-Traditional.</b> 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.	
	<b>Income Level</b>	<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
	80%-50% Area Median Income	
	49%-30% Area Median Income	
	Below 30% Area Median Income	
	Total Local, Non-Traditional Households	<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.

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

<b>G.3</b>	<b>Substantially the Same (STS) – Local, Non-Traditional.</b>	
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	
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	

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

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.	

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

<b>H.</b>	<b>Public Comment</b>
	Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.

<b>I.</b>	<b>Evaluations.</b>
	No known evaluations.