



Housing Catalyst

PHA Annual Plan 2025

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Streamlined Annual PHA Plan (HCV Only PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA’s mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. The Form HUD-50075-HCV is to be completed annually by **HCV-Only PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, Small PHA, or Qualified PHA do not need to submit this form. Where applicable, separate Annual PHA Plan forms are available for each of these types of PHAs.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS and SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A.	PHA Information.																																	
A.1	<div> <div>PHA Name: Housing Catalyst</div> <div>PHA Code: CO-041</div> </div> <div>PHA Plan for Fiscal Year Beginning: (MM/YYYY): 2025</div> <div>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</div> <div>Number of Housing Choice Vouchers (HCVs) 1636</div> <div> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </div> <div> Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at the main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. </div> <div> <input type="checkbox"/> PHA Consortia: (Check box if submitting a joint Plan and complete table below) </div> <table border="1"> <tr> <th>Participating PHAs</th> <th>PHA Code</th> <th>Program(s) in the Consortia</th> <th>Program(s) not in the Consortia</th> <th>No. of Units in Each Program</th> </tr> <tr> <td>Lead HA:</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>				Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	Lead HA:																								
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B.	Plan Elements.				
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>a) Have the following PHA Plan elements been revised by the PHA since its last Annual Plan submission?</p> <p>Y N</p> <p><input type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input type="checkbox"/> Informal Review and Hearing Procedures.</p> <p><input type="checkbox"/> <input type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input type="checkbox"/> Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.</p> <p><input type="checkbox"/> <input type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification.</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element(s):</p>				
B.2	New Activities. – Not Applicable				
B.3	<p>Progress Report.</p> <p>Provide a description of the PHA’s progress in meeting its Mission and Goals described in its 5-Year PHA Plan.</p> <p>Attachment A</p>				
B.4	Capital Improvements. – Not Applicable				
B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N N/A</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>				
C.	Other Document and/or Certification Requirements.				
C.1	<p>Resident Advisory Board (RAB) Comments. (pending RAB board review meeting)</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N</p> <p><input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>				
C.2	<p>(a) Certification by State or Local Officials. (pending public review comment period and public meeting)</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>				

C.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i> , must be submitted by the PHA as an electronic attachment to the PHA Plan.					
C.4	Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. (b) Did the public challenge any elements of the Plan? (pending public review comment period and public meeting) (c) <table data-bbox="292 415 365 472"> <tr> <td>Y</td><td>N</td></tr> <tr> <td><input type="checkbox"/></td><td><input type="checkbox"/></td></tr> </table> If yes, include Challenged Elements.	Y	N	<input type="checkbox"/>	<input type="checkbox"/>	
Y	N					
<input type="checkbox"/>	<input type="checkbox"/>					
D.	Affirmatively Furthering Fair Housing (AFFH).					
D.1	Affirmatively Furthering Fair Housing (AFFH). Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item. <table border="1" data-bbox="181 844 1448 1297"> <tr> <td data-bbox="191 850 438 886">Fair Housing Goal:</td></tr> <tr> <td data-bbox="181 886 1448 1297" style="height: 150px;"></td></tr> </table> <table border="1" data-bbox="181 1318 1448 1738"> <tr> <td data-bbox="191 1325 438 1360">Fair Housing Goal:</td></tr> <tr> <td data-bbox="191 1360 889 1396"><u>Describe fair housing strategies and actions to achieve the goal</u></td></tr> <tr> <td data-bbox="181 1396 1448 1738" style="height: 150px;"></td></tr> </table>	Fair Housing Goal:		Fair Housing Goal:	<u>Describe fair housing strategies and actions to achieve the goal</u>	
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Instructions for Preparation of Form HUD-50075-HCV

Annual PHA Plan for HCV-Only PHAs

A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

- A.1 Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **Number of Housing Choice Vouchers (HCVs)**, **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan.

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

B. Plan Elements. All PHAs must complete this section. (24 CFR §903.11(c)(3))

B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.”

☐ **Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR 5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR § 903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA’s reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

☐ **Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.** A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for HCV. (24 CFR §903.7(b))

☐ **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA’s anticipated resources, such as PHA HCV funding and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))

☐ **Rent Determination.** A statement of the policies of the PHA governing rental contributions of families receiving tenant-based assistance, discretionary minimum tenant rents, and payment standard policies. (24 CFR §903.7(d))

☐ **Operation and Management.** A statement that includes a description of PHA management organization, and a listing of the programs administered by the PHA. (24 CFR §903.7(e)).

☐ **Informal Review and Hearing Procedures.** A description of the informal hearing and review procedures that the PHA makes available to its applicants. (24 CFR §903.7(f))

☐ **Homeownership Programs.** A statement describing any homeownership programs (including project number and unit count) administered by the agency under section 8y of the 1937 Act, or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

☐ **Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.** A description of any PHA programs relating to services and amenities coordinated, promoted, or provided by the PHA for assisted families, including those resulting from the PHA’s partnership with other entities, for the enhancement of the economic and social self-sufficiency of assisted families, including programs provided or offered as a result of the PHA’s partnerships with other entities, and activities subject to Section 3 of the Housing and Community Development Act of 1968 (24 CFR Part 135) and under requirements for the Family Self-Sufficiency Program and others. Include the program’s size (including required and actual size of the FSS program) and means of allocating assistance to households. (24 CFR §903.7(l)(i)) Describe how the PHA will comply with the requirements of section 12(c) and (d) of the 1937 Act that relate to treatment of income changes resulting from welfare program requirements. (24 CFR §903.7(l)(iii)).

☐ **Substantial Deviation.** PHA must provide its criteria for determining a “substantial deviation” to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

☐ **Significant Amendment/Modification.** PHA must provide its criteria for determining a “Significant Amendment or Modification” to its 5-Year and Annual Plan.

If any boxes are marked “yes”, describe the revision(s) to those element(s) in the space provided.

B.2 New Activities. This section refers to new capital activities which is not applicable for HCV-Only PHAs.

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.11(c)(3), 24 CFR §903.7(r)(1))

B.4 Capital Improvements. This section refers to PHAs that receive funding from the Capital Fund Program (CFP) which is not applicable for HCV-Only PHAs

B.5 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))

C. Other Document and/or Certification Requirements.

C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)

C.2 Certification by State of Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations, impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) Strategies and actions must affirmatively further fair housing" Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the Annual PHA Plan. The Annual PHA Plan provides a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 6.02 hour 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.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality

**Certifications of Compliance with
PHA Plan and Related Regulations
(Standard, Troubled, HCV-Only, and
High Performer PHAs)**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

**PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations
including PHA Plan Elements that Have Changed**

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the **2025-2029 5-Year and/or 2025 Annual PHA Plan**, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning **January 1, 2025**, in connection with the submission of the Plan and implementation thereof:*

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan 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 (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan 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 Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency 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), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For PHA Plans that include a policy for site-based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
 10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the 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.
 11. The 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.
 12. The 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.
 13. The 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.
 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
 15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
 16. With respect to public housing the 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.
 17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
 18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
 19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Housing Catalyst
PHA Name

CO-041
PHA Number/HA Code

☒ Annual PHA Plan for Fiscal Year 2025

☒ 5-Year PHA Plan for Fiscal Years 2025 - 2029

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 Executive Director Julie Brewen

Name Board Chairman Jennifer Wagner

Signature

Date

Signature

Date

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year 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.

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B.3 Progress Report (Attachment-A)

Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

Goal 1: Preserve existing affordable housing

- Housing Catalyst completed a Section 18 disposition of its remaining Public Housing in early 2024. Repositioned units are being renovated or redeveloped as affordable rentals or affordable home ownership opportunities.
- From 2020-2024, Housing Catalyst renovated 42 homes within the agency's affordable housing portfolio. The renovations will preserve these units as high-quality affordable rentals.
- In 2022, Housing Catalyst purchased a property with 27 units in a highly desirable location. The agency has preserved these apartments as affordable rentals.

Goal 2: Increase supply of affordable housing

- From 2020-2024, Housing Catalyst developed 139 homes with affordable rents. An additional 86 homes are currently in development. The agency also served as a Special Limited Partner on projects that created more than 300 new homes with affordable rents in Northern Colorado.
- In 2022 Housing Catalyst was selected to join the Landlord Incentives cohort of HUD's MTW demonstration program. The agency is implementing landlord incentives that aim to expand housing choice by increasing the number of local landlords participating in the Housing Choice Voucher program.

Goal 3: Empower and equip residents for stability and success

- Housing Catalyst supported hundreds of residents in achieving their health, financial, career, and educational goals through the JumpStart Family Self-Sufficiency program. In 2023, JumpStart graduates had an average escrow account of \$9,648, demonstrating a significant increase in their earned income.
- In 2021 Housing Catalyst opened its second Permanent Supportive Housing community in Fort Collins. Mason Place, a 60-unit building in mid-town Fort Collins, features wraparound services, easy transit access, and Trauma Informed Design features.
- Housing Catalyst piloted a positive rent reporting program with the Colorado Housing and Finance Authority. More than 200 residents participated in the pilot, and participating residents saw an average credit score increase of 69 points. The program has since been adopted at all Housing Catalyst properties.

Goal 4: Achieve business/organizational excellence

- Housing Catalyst has made efforts to more fully utilize Yardi software to improve internal and external processes. Voucher program applicants can now complete their applications via an online portal and HCV landlords can review their HAP history online.
- Housing Catalyst has reviewed and refined many of its policies, processes, and standard operating procedures to promote more effective operations.
- The agency has strategically added staff to accommodate a growing number of vouchers, rental properties, and development projects.

Goal 5: Build community support for affordable housing

- Housing Catalyst partnered with the Downtown Development Authority to develop Oak 140. The 79-apartment mixed used building is the first LIHTC development in downtown Fort Collins designed with the downtown workforce in mind. The project represents what's possible with a well-coordinated community effort.
- Housing Catalyst banded together with other housing-focused agencies and nonprofits to form One Voice for Housing. The organization advocates for better local policies that support housing affordability, equity, accessibility, and sustainability.
- Housing Catalyst has built and maintained relationships with a vast network of community partners, including the City of Fort Collins, the Town of Wellington, Larimer County, the Northern Colorado Continuum of Care, the Northern Colorado Rental Housing Association, and the Fort Collins Affordable Housing Board.

**Certification by State or Local
Official of PHA Plans Consistency
with the Consolidated Plan or
State Consolidated Plan
(All PHAs)**

U. S Department of Housing and Urban Development

Office of Public and Indian Housing

OMB No. 2577-0226

Expires 3/31/2024

**Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan**

I, Beth Rosen, the HUD Grants Policy and Compliance Manager
Official's Name *Official's Title*

certify that the 5-Year PHA Plan for fiscal years 2025-2029 and/or Annual PHA Plan for
fiscal year 2025 for **Housing Catalyst and Larimer County Housing Authority** is consistent with the
PHA Name

Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair
Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

City of Fort Collins
Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR § 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or
State Consolidated Plan.

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:
Manager, Social

Beth Rosen

Title: HUD Grants Policy and Compliance

Sustainability

Signature:

Date:

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PHA Name: Fort Collins Housing Authority (Housing Catalyst)

PHA Code : CO041

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 1/1/2025

PHA Program Type: Combined

MTW Cohort Number: Landlord Incentives

MTW Supplement Submission Type: Annual Submission

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B. MTW Supplement Narrative.

Housing Catalyst is the Public Housing Authority for the City of Fort Collins, Colorado. We are a mission-driven real estate developer and the largest property management company in northern Colorado. Housing Catalyst provides sustainable, long-term housing solutions, serving more than 1,600 families per year. Employing innovative programs and resident support systems, Housing Catalyst offers critical tools and resources that families need while creating vibrant, sustainable communities throughout Fort Collins.

Housing Catalyst's vision for its participation in the MTW program integrates our mission and objectives with the federal statutory objectives of the MTW program to increase cost-effectiveness, self-sufficiency, and housing choice.

Housing Catalyst is only applying MTW initiatives to its HCV program in this supplement. The Public Housing program has completed disposition through the RAD and Section 18 tools. By focusing on the recruitment of new landlords who are currently not participating in the HCV program, Housing Catalyst will further its mission of increasing housing choices for families through policies which encourage landlord participation and increase units available to families in the local housing market.

This year Housing Catalyst will primarily focus on two landlord initiatives: 1) Incentive payments, and 2) damage claims.

These initiatives will address cost effectiveness by increasing utilization rates and decreasing the amount of time voucher holders are searching for housing; self-sufficiency by encouraging voucher holders to seek out neighborhoods with greater opportunity and providing incentives for new landlords in those areas who were not previously working with the voucher program; and housing choice by increasing the pool of landlords who welcome a housing choice voucher.

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

1. Tenant Rent Policies	
1.I. Alternative Utility Allowance	Planning to Implement in Submission Year
2. Payment Standards and Rent Reasonableness	
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing
3. Reexaminations	
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in Submission Year
d. Self-Certification of Assets (HCV)	Currently Implementing
4. Landlord Leasing Incentives	
b. Damage Claims (HCV-Tenant-based Assistance)	Currently Implementing
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Currently Implementing
5. Housing Quality Standards (HQS)	
c. Third-Party Requirement (PBV)	Currently Implementing
C. Third -Party Requirement (HCV all PHA owned)	Planning to Implement in Submission Year.
6. Short-Term Assistance	
7. Term-Limited Assistance	
8. Increase Elderly Age (PH & HCV)	
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Currently Implementing
b. Increase PBV Project Cap (HCV)	Currently Implementing
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Currently Implementing
9.h Limited Portability for Project-based units	Plan to implement in Submission Year
10. Family Self-Sufficiency Program with MTW Flexibility	
11. MTW Self-Sufficiency Program	
12. Work Requirement	
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
14. Moving on Policy	
15. Acquisition without Prior HUD Approval (PH)	
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	

C. MTW Activities Plan that Fort Collins Housing Authority (Housing Catalyst) Plans to Implement in the Submission Year or Is Currently Implementing

<p>2.d. - Rent Reasonableness – Third-Party Requirement (HCV) (2023-W-2.d.)</p> <p>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> <p>Description: Housing Catalyst will use MTW flexibility to perform rent reasonable determinations on units that it owns, manages, and/or controls. Housing Catalyst will make reasonable rent determinations with the support of third-party software that taps into a national database. This process will ensure fair and valid determinations.</p> <p>Agency goals for MTW Activity: Increase rent reasonable turn window to support on-time reporting. This waiver supports Housing Catalyst's larger goal of using MTW flexibility to streamline administrative processes and reduce agency costs.</p> <p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Housing choice</p>
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<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Neutral (no cost implications)</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>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.</p> <p>Housing Catalyst implemented this activity in Fall 2023. The agency will be tracking data to determine time saved by streamlining this internal process.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Please explain or upload a description of the quality assurance method.</p> <p>Reasonable rent determinations will be made with the support of a third-party database that is updated annually based on market conditions</p> <p>No document is attached.</p>
<p>Please explain or upload a description of the rent reasonableness determination method.</p> <p>The agency will determine rent reasonableness with the support of third-party software. Housing Catalyst will enter demographic information for each type of unit, including location, quality, size, type, age of unit, amenities, maintenance, and utilities to be provided by the owner</p> <p>No document is attached.</p>

<p>3.d. - Self-Certification of Assets (HCV) (2023-W-3.d)</p>
<p>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> <p>Description: At reexamination, Housing Catalyst may allow the self-certification of assets up to \$50,000. This would lower barriers to participants in obtaining asset verification.</p> <p>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 Housing Catalyst's larger goal of using MTW flexibility to streamline administrative processes and reduce agency costs.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Housing choice</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Neutral (no cost implications)</p>

<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>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.</p> <p>This waiver parallels the threshold for HOTMA updates.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Please state the dollar threshold for the self-certification of assets.</p> <p>\$50,000.</p>

<p>4.b. - Damage Claims (HCV-Tenant-based Assistance) (2023-A-4.b.)</p>
<p>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> <p>Description: Housing Catalyst will reimburse landlords for the cost of tenant caused damages (minus the security deposit). The amount of compensation will not exceed the lesser of the cost of damages or two months contract rent. Damages must be documented and accepted by Housing Catalyst. Housing Catalyst will require proof that damages are beyond ordinary wear and tear and documentation of the charges to the tenant's security deposit as a part of the claim process. Documentation of actual damage costs is required; Housing Catalyst will not pay based on estimates. Housing Catalyst may charge these costs to the tenant as a condition for remaining in the program. The payment will be made to a landlord when the next HAP contract is executed between the owner and Housing Catalyst. Housing Catalyst has updated its Administrative Plan to reflect the damage claim policy.</p> <p>Agency goals for MTW Activity: Increase the number of participating landlords and create increased housing options for HCV families.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Housing choice</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Increased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>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.</p> <p>Since this activity was approved for 2023, Housing Catalyst has been laying the groundwork for implementation. Full implementation is dependent upon software updates, HIP system availability, and reserve funds.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>

<p>Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?)</p> <p>To all units</p>
<p>What is the maximum payment that can be made to a landlord under this policy?</p> <p>Up to two months contract rent under the HAP contract.</p>
<p>How many payments were issued under this policy in the most recently completed PHA fiscal year?</p> <p>0 (number will be updated for submission for all payments made by August 31, 2024)</p>
<p>What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?</p> <p>\$0 (number will be updated for submission for all payments made by August 31, 2024)</p>

<p>4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance) (2023-A-4.c.)</p>
<p>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> <p>Description: Housing Catalyst will issue a one-time payment to new landlords who rent a unit to a family with a Housing Choice Voucher. This monetary incentive would be available to landlords who had not received a HAP payment in the prior three years. Offering a financial reward to landlords for joining the program would increase the number of participating landlords, expand housing options into new neighborhoods, and address specific landlord issues. Payments made to the landlord would not exceed more than one month of the contract rent. The payment will be made to the landlord when a HAP contract is executed between the owner and Housing Catalyst.</p> <p>Agency goals for MTW Activity: Increase participating landlords and create increased housing options for HCV families.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Housing choice</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Increased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>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.</p> <p>Since this activity was approved for 2023, Housing Catalyst has been laying the groundwork for implementation. Full implementation is dependent upon software updates, HIP system availability, and reserve funds.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?)</p> <p>Certain types of units only</p>

<p>What is the maximum payment that can be made to a landlord under this policy?</p> <p>\$500</p>
<p>How many payments were issued under this policy in the most recently completed PHA fiscal year?</p> <p>0 (number will be updated for submission for all payments made by August 31, 2024)</p>
<p>What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?</p> <p>\$0 (number will be updated for a leasing payments made by August 31, 2024)</p>

<p>5.c. - Third-Party Requirement (HCV) (2023-W-5.c)</p>
<p>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> <p>Description: Housing Catalyst will perform Housing Quality Standards (HQS) inspections on project-based units that it owns, manages, and/or controls. Housing Catalyst will establish and make available a quality assurance method to ensure an objective analysis, and at the department's request, the agency will obtain the services of a third-party entity to determine if a Housing Catalyst owned unit passes HQS. HQS inspection standards will not be altered from the guidance found at 24 CFR 982.401. The participant will be able to request an interim inspection at any time.</p> <p>Agency goals for MTW Activity: Streamline the HQS inspection process to match non-PHA owned HQS inspections. This waiver supports Housing Catalyst's larger goal of using MTW flexibility to streamline administrative processes and reduce agency costs.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Housing choice</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Decreased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>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.</p> <p>This activity was implemented in Fall 2023. Housing Catalyst will be tracking the cost savings of moving from a contract inspector and the time savings of streamlining the scheduling process.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Please explain or upload the description of the quality assurance method:</p> <p>Following will explain the quality assurance method Housing Catalyst supervisor will re-inspect a sample of units for quality control of HQS inspections in accordance with 24 CFR 982.405(b) and 24 CFR 985.2.</p> <p>No document is attached.</p>

9.a. - Increase PBV Program Cap (HCV) (2023-W-9.a)

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: Housing Catalyst may increase the number of authorized units it project-bases.

Agency goals for MTW Activity: Increase the number of participating landlords and create increased housing options; create family stability in an environment with support to encourage family self-sufficiency.

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

Housing choice

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<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Neutral (no cost implications)</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>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.</p> <p>The waiver will be implemented according to agency needs. The need for the waiver did not arise in 2024.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>What percentage of total authorized HCV units will be authorized for project-basing?</p> <p>50.00%</p>

<p>9.b. - Increase PBV Project Cap (HCV) (2023-W-9.b)</p>
<p>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> <p>Description: Housing Catalyst may raise the Project Based Voucher cap within a project up to 100%.</p> <p>Agency goals for MTW Activity: Create family stability in an environment with support to encourage family self-sufficiency.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Housing choice</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Neutral (no cost implications)</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>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.</p> <p>The waiver will be implemented according to agency needs. The need for the waiver did not arise in 2024.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>

<p>9.c. - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV) (2023-W-9.c)</p>
<p>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>

Description: Housing Catalyst 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) or by Housing Catalyst in alignment with the third-party requirement waiver (5.C). 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.

Agency goals for MTW Activity: Increase the number of participating landlords and create increased housing options; create family stability in an environment with support to encourage family self-sufficiency.

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 needs. The need for the waiver did not arise in 2024.

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

No

Proposed Waivers 2025

2025- 1.I. Alternative Utility Allowance –
<p>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> <p>Description: Housing Catalyst may create a utility schedule(s) for all HCV units based upon bedroom size, the unit location and/or types or utilities paid by participant. The agency may establish a site-based utility allowance in the Project Based Voucher program.</p> <p>This activity is designed to increase voucher holders’ understanding of the rent calculation, specifically how utilities affect the contract rent allowed. Implementation of this activity would allow for less time spent during initial briefings to explain utility allowance, as well as less potential for calculation error. Tenant rent changes will be comparable to current portions as annual utility allowance review data will be used to establish flat rate.</p> <p>Statutes and Regulations Waived Alternative Utility Allowance (HCV) - Certain provisions of section 8(o)(2)(D)(i) of the 1937 Act and 24 CFR 982.517 and 983.301(f)(2)(ii).</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Housing choice; Cost effectiveness</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Neutral</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>Does this MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>New admissions and currently assisted households</p>
<p>Does the MTW activity apply to all family types or only selected family types?</p> <p>The MTW activity applies to all family types.</p>
<p>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p> <p>The MTW activity applies to tenant-based units and/or properties with project-based vouchers</p>
<p>Please describe which tenant-based units/and or properties with project-based vouchers participate in the MTW activity.</p> <p>Housing Catalyst will apply this waiver to all units in tenant-based vouchers and all project-based vouchers</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>Yes</p>

- The utility schedule must be based upon number of bedrooms, the property location, and/or the types of utilities paid by participant.
- The agency must review its schedule of utility allowances each year and revise its allowance for a utility category if there has been a change of 10 percent or more of the cost from the prior year. The agency must maintain information supporting its annual review of utility allowances and any revisions made in its utility allowance schedule.
- The agency must not include items in the utility schedule that are excluded under HUD regulations.

Please explain or upload the description of the quality assurance method:

Annually the utility allowance is evaluated for an increase or decrease of 10%, for updates. The annual study data will be used to establish a flat utility allowance, by unit size and type.

Annual Metrix will be monitored for Total cost of task dollars, total time to complete the task in staff hours, average error in completing a task, Tenant rent share in dollars.

No documents provided.

3.b. – Alternative Reexamination Schedule for Households (HCV)

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: Housing Catalyst proposes waiving certain provisions of the following policies:

- Sections 3(a)(a), 3(a)(2)(E), and 8(o)(5) of the 1937 act
- 24 CFR Parts 960.257(a)-(b), 982.516(a)(1) and 982.526(c)(2)

Waiving these provisions will allow Housing Catalyst to implement a biennial recertification policy for all households in the Housing Choice Voucher program. Reducing the frequency of recertifications allows households to keep more of their income as their income increases. It also reduces the burden for staff and participants in acquiring, submitting, and processing paperwork. Under this waiver, all households will have a reexamination once every two (2) years. As part of this policy change, the following policy decisions were made:

- Approved rent increases will use an interim 50058 and will apply the most current payment standard and utility allowance. This will not result in an income review.
- Housing Catalyst will not conduct an interim reexamination for the entire household when a new household member is added and in accordance with HOTMA regulations.
- Limit the number of voluntary interim recertifications that a household may complete between regular biennial recertifications to one (1). Required interim recertifications do not count against the limit. Elderly and disabled households are exempt from this provision and are able to complete an interim recertification at any time.
- Households that move to a new unit, will be in accordance with HOTMA regulation based on the recertification cycle.

Exemptions:

- Households that claim zero income will continue to complete income review as per Housing Catalyst policy
- Households that report an increase in income, resulting in a 10% change in income per HOTMA regulations, will result in completing of an interim
- Elderly and disabled households are exempt from limitation of voluntary interim recertifications between regular biennial recertifications

Agency goals for MTW Activity: Decrease administrative time required to complete recertifications, allowing staff to focus on other priorities. This waiver supports Housing Catalyst's larger goal of using MTW flexibility to streamline administrative processes and reduce agency costs.

The proposed activity meets all safe harbor requirements:

1) Reexaminations must occur at least every three years.

<p>2) The agency must allow at least one interim adjustment per year at the request of the household if the household gross income has decreased 10% or more.</p> <p>3) Agency must implement an impact analysis.</p> <p>4) Agency must include a hardship policy</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Decrease expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households served under the HCV program</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or both new admissions and currently assisted households?</p> <p>The MTW activity applies to new admissions and currently assisted households</p>
<p>Does the MTW activity apply to all family types or only selected family types?</p> <p>The MTW activity applies to all family types</p>
<p>Please select the family types subject to this MTW activity.</p> <p>The MTW activity applies to all family types</p>
<p>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p> <p>The MTW activity applies to all tenant-based units and properties with project-based vouchers</p>
<p>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.</p> <p>Housing Catalyst proposes to begin implementation January 1, 2025.</p>
<p>Does this MTW activity require a hardship policy?</p> <p>Yes, hardship policy attached at the end of this supplement</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>

No

Does the MTW activity require an impact analysis?

Yes, impact analysis attached at the end of this supplement

What is the recertification schedule?

Once every 2 years

How many interim recertifications per year may a household request?

One voluntary interim recertifications between regular biennial recertifications. Required interim recertifications do not count against the limit. Elderly and disabled households are exempt from this provision and are able to complete an interim recertification at any time.

Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule:

- i. Households that claim zero income will continue to complete income review as per Housing Catalyst policy.
- ii. Households that report an increase in income, resulting in a 10% change in income per HOTMA regulations, will result in completing of an interim.
- iii. Housing Catalyst will allow one (1) voluntary interim recertifications between regular biennial recertifications. Elderly and disabled households are exempt from this provision and are able to complete an interim recertification at any time.

2025-5.c.Third-Party Requirement (HCV)

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:

Housing Catalyst proposes waiving certain provisions of Section 8(o)(11) of the 1937 Act, 24 CFR Part 982.352(b)(iv), and 24 CFR Part 983.103(f). Waiving these provisions will allow Housing Catalyst to eliminate the requirement that the PHA use a third-party entity to perform Housing Quality Standard (HQS) inspections on units and properties the agency owns, manages, or controls .

Procuring and overseeing a third-party contractor for HQS inspections services is costly and time-consuming for the agency. Instead, Housing Catalyst will utilize its in-house HQS inspection team and the policies and procedures governing HQS inspections for the Housing Choice Voucher program.

The HQS inspection process has built-in quality control measures in place that will help to ensure the inspections performed at properties owned or managed by Housing Catalyst are uniform fair and that the process is transparent and auditable.

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

Cost Effectiveness

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

Decreased 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 only a subset or subsets of assisted housing

Does this MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New Admissions and Currently Assisted Households

Does the MTW activity apply to all family types or only selected family types?

The MTW Activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers- this will apply to all units in tenant based or project based that Housing Catalyst owns.

Please describe which tenant-based units/and or properties with project-based vouchers participate in the MTW activity.

Housing Catalyst will apply this waiver to all units in tenant-based vouchers and all project-based vouchers for properties it owns, manages, and controls.

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

- The agency shall establish and make available a quality assurance method to ensure an objective analysis*
- The participant must be able to request an interim inspection *
- HQS/ or NSPIRE standards must not be altered as found at 24 CFR 982.401*
- At the Department's request, the agency must obtain the services of a third-party entity to determine if PHA-owned units past HQS/ NSPIRE. *

Please explain or upload the description of the quality assurance method:

Housing Catalyst will continue to inspect units to the HQS standard found at 24 CFR 982.401, or the current standard required by HUD, and any staff conducting inspections will be trained on this standard. A random sample of Housing Catalyst owned or controlled units that have been inspected by a Housing Catalyst staff person will be selected for a quality control by a supervisor or third-party. Participants will be able to request an interim inspection. Housing Catalyst will obtain the services of a third-party entity to determine if a PHA-owned unit passes HQS, upon the request of HUD.

No document is attached.

2025- 9.h. Limit Portability for PBV units**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**

Housing Catalyst proposes waiving certain provisions of Section 8(o)(13)(E) of the 1937 Act and 24 C.F.R. Part 983.261 as it was superseded by HOTMA Implementation Notices at 82 FR 5458 and 82 FR 32461. These waivers will allow Housing Catalyst to waive the requirement that PHA's provide a tenant-based voucher to project-based households after being on a project-based voucher for twelve (12) months. Instead, Housing Catalyst proposes to limit portability to twenty-four (24) months

Waiving the 12 months will:

- Prioritize limited resources to the neediest families and align available housing resources with community needs. Ensure households currently on the waiting list, some of whom are currently unhoused and have been waiting for a voucher, are offered voucher assistance.
- Allowing more time for entities working with households who are using Project-Based Vouchers for support to have a success plan in place when moving to a private market.
- Improve participant overall satisfaction and engagement with the program with a realistic understanding of the time frame for progression to tenant-based assistance.
- Decrease administrative burden.

This MTW activity waives certain provisions of section 8(o)(13)(E) of 1937 Act and 24 CFR983.261 as it was superseded by HOTMA Implementation Notices at 82 FR 5458 and 82 FR 32461

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

Cost Effectiveness and 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.

Decreased 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 project-based assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households or to both new admissions and currently assisted households?

New admissions and currently assisted households.

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based and properties with project-based vouchers?

The MTW activity applies to all properties with project-based vouchers

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

Yes

- Portability under this activity may not be restricted to more than 24 months.
- The agency must have a clear and uniform policy in place to address how the move requests are received and how they are approved/denied for project-based households*
- Participants must still retain the ability to request a tenant-based voucher for a reasonable accommodation according to existing rules*

Please explain or upload the description of the quality assurance method:

Annually the WL selection process is reviewed using the steps described in HUD's SEMAP review process (MTW not subject to SEMAP submission) Selections will be monitored to ensure that applicants have been issued a voucher should one be available, in the correct order or if a tenant-based voucher is not available added to the waitlist in date and time order.

D.	Safe Harbor Waivers.
D.1	<p>Will the MTW agency submit requests for approval of a Safe Harbor Waiver this year?</p> <p>No Safe Harbor Waivers are being requested.</p>

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, 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, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>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), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please 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 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.</p> <p>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p>No Agency-Specific Waivers are being requested.</p>
E.2	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>Does the MTW agency have any approved Agency-Specific Waivers?</p> <p>MTW Agency does not have approved Agency-Specific Waivers</p>

F.	Public Housing Operating Subsidy Grant Reporting.
F.1	<p>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.</p> <p>Housing Catalyst Public Housing Program ended in 2024.</p>

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
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G.	MTW Statutory Requirements.
G.1	<p>75% Very Low Income – Local, Non-Traditional.</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	
Total Local, Non-Traditional Households	0

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

G.2	Establishing Reasonable Rent Policy.

G.3	Substantially the Same (STS) – Local, Non-Traditional.
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	# 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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G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.	
Occupied Number of Local, Non-Traditional units by	

Family Size:	Household Size
1 Person	
2 Person	
3 Person	
4 Person	
5 Person	
6+ Person	
Totals	0

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

I.	Evaluations.
No known evaluations.	

HARDSHIP POLICY OVERVIEW

For a PHA in the Moving to Work demonstration, HUD requires the agency to adopt a policy for addressing hardship cases caused by certain agency established initiatives. Housing Catalyst recognizes that policies implemented under the Moving to Work flexibilities may have an adverse impact on some households. The hardship policy is designed to minimize any negative impact the MTW policies may have on assisted households. HC will review all proposed program terminations and consider if a household qualifies for a hardship exemption prior to a final termination.

- ◆ There is no limit to the number of hardships that a household may request and receive.
- ◆ If a household is approved for a hardship, and subsequently experiences another adverse event while still in hardship status, they may request an additional hardship that might impact their total tenant payment (TTP).
- ◆ If a household is approved for a hardship, they are not required to report subsequent income changes (increase or decrease) during the period of their approved hardship; the hardship rent will remain in effect until the end of the period approved for the hardship.
- ◆ If a household is approved for a temporary hardship, when that hardship is scheduled to expire the household will be notified and may request an extension.

HARDSHIP REQUEST AND APPROVAL PROCESS

Households who request a hardship will be subject to the hardship process outlined below.

- ◆ All hardship requests must be in writing.
- ◆ When a household makes a written request for a hardship exemption from a required MTW activity, HC will request verification of the hardship.
- ◆ Households will be required to provide verification of the hardship within 10 calendar days from the date of the hardship request.
- ◆ Within 10 calendar days from receipt of verification of the hardship, HC will decide as to whether or not to grant the hardship.
- ◆ The hardship HC will be calculated consistent with applicable HC hardship policies described further below and will remain in effect for the period for which the hardship has been granted.
- ◆ HC will retain records of all hardship requests received and the results of these requests and supply them at HUD's request.

FINANCIAL HARDSHIP EXEMPTION FROM MTW Waiver 3.b

This is a hardship policy to protect families from potential rent burden caused by a change in family circumstances for which HC would generally not conduct an interim reexamination. The family may request a hardship to request more than one interim recertification within a calendar year. HC will grant an additional interim recertification within a calendar year if households report a reduction in their household's income of any amount with would result in decrease in their tenant rent payment.

IMPACT ANALYSIS for MTW Waivers 3.b; Alternative Re-examination Schedule - HCV

An analysis was performed using 50058 data from the previous year. Housing Catalyst does not anticipate the policy changes to have a negative impact on any households. Therefore, HC measured the positive impact to identify the following areas of impact for the agency.

Impact Analysis - Activity 3.b - Alternative Reexamination Schedule

Impact on the Agency's Finances

This activity is expected to reduce administrative costs due to fewer required annual and interim recertifications. Overall, there is no anticipated impact on HAP expenditures. In FY2023, across all programs (regular voucher plus special purpose vouchers), Housing Catalyst processed 1,515 annual recertifications and 704 interim reexaminations. The annual recertifications will be reduced by approximately 50%. Interims should decrease by at least 22% each year.

Population	Baseline	Outcome
Total Households	1,588	
Average Number of interims per HH/year	<1/year	
Average Monthly HAP/HH(2023)	873	
Number of interims last year (2023)	704	
Number of annuals last year (2023)	1515	
Number of annuals under new policy		794
Number of interims under new policy		545
Reduction in number of reviews		50%
Reduction in number of interims		22%
Annual cost savings due to reduction in number of reviews		
1 - Average time staff on recertifications (decrease)	7,280 hrs./year	3,640 hrs./yr.
2 - Administrative cost recerts/year (decrease)	\$ 225,680.00	\$ 112,840.00
3 - Administrative cost interims/year (decrease)	\$ 21,824.00	\$ 16,895.00

Impact on Affordability of Housing Costs for Affected Families

This activity will positively impact affordability for families as rent increases will only take effect only when income increases significantly. Families will have increased disposable income for other needs.

Impact on agency's waitlist(s)

This activity will have no impact on the Waiting List.

Impact on agency's termination rate of families

This activity is not expected to impact on the termination rate.

Impact on the agency's current occupancy level in PH and utilization in the HCV program

This activity is not anticipated to impact occupancy or utilization rates.

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

This activity will have a positive impact on the meeting the MIW goals as it will result in cost effectiveness for HC and provide additional self-sufficiency initiatives for households.

Impact on agency's ability to meet the MIW statutory requirements

This activity is not anticipated to impact HC's ability to meet statutory goals.

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

This activity is not expected to impact the rate of hardship requests.

Impact on Protected classes (and any disparate impact)

This activity is not expected to impact any protected class and will have not disparate impact

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