

Explanatory Note to Public Reviewers of the Proposed Moving to Work Supplement Fillable Form

The Moving to Work (MTW) Supplement collects information about policies implemented by MTW expansion agencies. MTW agencies use it to communicate their plans with residents and community stakeholders through required public comment processes, and HUD uses the information collected to monitor and evaluate the MTW demonstration program. MTW agencies will submit the MTW Supplement to HUD annually and amend as needed. HUD plans to make the MTW Supplement into a fillable form so as to reduce respondent burden and make the information collected more useful to HUD. When the MTW Supplement is available through the fillable form, it will include skip patterns¹ that prompt the user to populate only the sections relevant to what they are currently implementing. It will also include screening questions that will ask which waivers and associated activities they are currently implementing, plan to implement in the upcoming year, or will be discontinued in the submission year. The MTW Agency will be able to print the information from the MTW Supplement in a reader-friendly format in order to inform the public of its plans for the upcoming year. The purposes of the MTW Supplement are two-fold: it reports to HUD what is happening at the local level in a way that the Department can monitor and evaluate; and, more importantly, it informs the public about what the agency is planning and gives the public the ability to provide comment.

The MTW Supplement asks for information about each of the MTW Waivers and associated activities that are made possible by the MTW Operations Notice, Safe Harbor Waivers and Agency-Specific Waivers, and a few other types of information. MTW agencies will fill in information/data through a fillable form and the information collected will be stored in a database so that it can be analyzed by HUD. The approved forms will be posted to the MTW website for viewing by the public. For instance, it will be simple to find out how many MTW agencies and which MTW agencies are implementing each type of activity. It will also simplify reporting for the MTW agency since information will carry over year-to-year in the fillable form so that information that does not change from year to year will be pre-populated, thereby reducing respondent burden.

This document lists the sections of the MTW Supplement and then presents the proposed questions to be included in the MTW Supplement for MTW agencies to answer annually. Throughout the online version, there will be a dropdown menu option that makes it clear as to which activities an agency is permitted to do within the safe harbors of the MTW Operations Notice, Appendix I, MTW Waivers.

Sections of the MTW Supplement:

- A. PHA Information
- B. Narrative
- C. MTW Waivers and Associated MTW Activities
- D. Safe Harbor Waivers
- E. Agency-Specific Waivers
- F. Public Housing Operating Subsidy Grant Reporting
- G. MTW Statutory Requirements
- H. Public Comments
- I. Evaluations
- J. MTW Certifications of Compliance

Information to be Collected for MTW Activities

There are many MTW activities, subject to limitations as outlined in the MTW Operations Notice, that an MTW agency may implement. Each MTW agency will likely only engage in a subset of these MTW activities. The MTW Supplement will first ask MTW agencies to identify which MTW activities they are proposing to implement and which of those MTW activities they are already implementing. MTW agencies will subsequently be asked to provide information only about the MTW activities they are proposing to implement or are already

implementing. This feature will reduce respondent burden. MTW waivers have associated MTW activities. MTW agencies are also able to combine MTW activities into their own initiatives.

MTW agencies will be asked for specific information about each MTW activity they are proposing to implement or are already implementing. There are six types of questions that could be asked about each MTW activity. The exact mix of questions will depend partly upon the MTW activity and partly upon the requirements for that MTW activity listed in the MTW Operations Notice. The six types of questions are:

- (1) Core—questions applicable to most MTW activities
- (2) Custom—questions specific to an individual MTW activity
- (3) Safe Harbor Waiver—questions asked when the MTW activity requires a Safe Harbor Waiver
- (4) Hardship Policy—questions asked when the MTW Operations Notice requires a hardship policy for the MTW activity
- (5) Impact Analysis—questions asked when the MTW Operations Notice requires an impact analysis for the MTW activity
- (6) Agency-Specific Waiver—questions asked when the MTW activity requires an Agency-Specific Waiver

¹ A skip pattern is a question or series of questions associated with a conditional response.

Questions

The questions are presented below by type, beginning with the core questions. In the final online version of the MTW Supplement, the relevant questions from each type will be asked together in relation to each MTW activity the MTW agency is proposing to implement or is already implementing. The final online version of the MTW Supplement will be set up to allow for different versions of the same MTW activity—for instance, a different minimum rent for the non-elderly/non-disabled than for the elderly/disabled. The final online version of the MTW Supplement will also be able to autofill items with information from previous years. This feature will reduce respondent burden.

Table 1, at the end of this document, lists the MTW activities and indicates which types of questions need to be asked about each one.

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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): 1/1/2026

PHA Program Type: Combined

MTW Cohort Number: Landlord Incentives

MTW Supplement Submission Type: Annual Submission

2026 new activities or adjustment to current Supplement in Red

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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.

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	
h. Tenant Payment as a Modified Percentage of Income (HCV)	Plan to Implement in Submission Year
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
n. Utility Reimbursement (HCV)	Plan 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)	Currently Implementing
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 (HCV) Written as two separate activities; both approved	Currently Implementing
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
h. Limit Portability for PBV Units (HCV)	Currently Implementing
10. Family Self-Sufficiency Program with MTW Flexibility 10d and 10e Plan to implement in Submission Year	
11. MTW Self-Sufficiency Program	
12. Work Requirement	
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
14. Moving on Policy	
15. Acquisition without Prior HUD Approval (PH)	
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	
Agency Specific Waiver:	
Expediting Initial Eligibility Income Verification Process	Plan to Implement in Submission Year

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

1.h. Tenant Payment as a Modified Percentage of Income

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 will modify the percentage of income used in the calculation of total tenant payment. The tenant payment in the Housing Choice Voucher Program will be equal to 35% of monthly adjusted income.

Agency goals for MTW Activity: Cost savings to Housing Catalyst by reducing the amount of Housing Assistance Payment (HAP) paid to landlords. This waiver supports Housing Catalyst's larger goal of using MTW flexibility to reduce agency costs and self-sufficiency.

The proposed activity meets all safe harbor requirements:

- 1) The Tenant Payment in public housing and the Tenant Payment in HCV must not exceed 35% of income for non-elderly/non-disabled families if the agency is not utilizing flexibility under activities 1.r, 1.t and/or 1.v (for 1.g) or 1.s, 1.u and/or 1.w (for 1.h)
- 2) Agency must exempt elderly and disabled families from rent policy
- 3) Agency must conduct impact analysis
- 4) Agency must implement a hardship policy

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

Cost effectiveness, self-sufficiency

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

Decrease 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 households served under the HCV program

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

The MTW activity applies to 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 only non-elderly and non-disabled households

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled family types

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

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

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.

Housing Catalyst proposes to begin implementation upon approval of activity

Does this MTW activity require a hardship policy?

Yes, hardship policy attached at the end of this supplement, Exhibit A

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

No

Does the MTW activity require an impact analysis?

Yes, impact analysis attached at the end of this supplement, Exhibit B

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1.j. Alternative Utility Allowance

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 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.

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 error. Tenant rent will be comparables to current portions as annual utility allowance review data will be used to establish flat rate.

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).

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

Housing choice; 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 and/or neutral

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

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 tenant-based units and/or properties with project-based vouchers

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

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

Yes

- 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.

1.n. Utility Reimbursement

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 will eliminate the utility allowance reimbursement when the utility allowance is greater than the total tenant payment. This calculation will be applied to new tenants and existing tenants at their reexamination. To reduce costs and the administrative burden of issuing these payments HC will eliminate this practice.

This waiver supports Housing Catalyst's larger goal of using MTW flexibility to reduce agency costs and administrative burden.

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

Cost effectiveness; self-sufficiency

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

Increased revenue; Decrease 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 households served under the HCV program

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

The MTW activity applies to 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

Please select the family types subject to this MTW activity.

N/A applies to all family types

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

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

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.

Housing Catalyst proposes to begin implementation upon approval of activity

Does this MTW activity require a hardship policy?

No

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

No

Does the MTW activity require an impact analysis?

No

2.d. - Rent Reasonableness – Third-Party Requirement (HCV) (2023-W-2.d.)

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 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.

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.

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.

Housing Catalyst implemented this activity in Fall 2023. The agency will be tracking data to determine time saved by streamlining this internal process.

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

No

Please explain or upload a description of the quality assurance method.

Reasonable rent determinations will be made with the support of a third-party database that is updated annually based on market conditions

No document is attached.

Please explain or upload a description of the rent reasonableness determination method.

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

No document is attached.

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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:

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

Waiving these provisions will allow HC 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:

- i. Approved rent increases will use an interim 50058 and will apply the most current payment standard. This will not result in an income review.
- ii. HC will not conduct an interim reexamination for the entire household when a new household member is added and in accordance with HOTMA regulations
- iii. 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.
- iv. Households that move to a new unit will be in accordance with HOTMA regulation based on the recertification cycle

Exemptions:

- v. Households that claim zero income will continue to complete income review as per Housing Catalyst policy
- vi. Households that report an increase in income, resulting in a 10% change in income per HOTMA regulations, will result in completing of an interim
- vii. 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.
- 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.
- 3) Agency must implement an impact analysis.
- 4) Agency must include a hardship policy

<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>N/A: Applies to all family types</p>
<p>Does the MTW activity apply to all HV 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>Activity implementation date has been delayed; implementation began quarter 4 of 2025.</p>
<p>Does this MTW activity require a hardship policy?</p> <p>Yes, hardship policy attached at the end of this supplement, EXHIBIT A</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Does the MTW activity require an impact analysis?</p> <p>No, not annually during implementation</p>
<p>What is the recertification schedule?</p> <p>Once every 2 years</p>
<p>How many interim recertifications per year may a household request?</p> <p>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.</p>

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.

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3.d. - Self-Certification of Assets (HCV) (2023-W-3.d)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Description: At reexamination, Housing Catalyst may allow the self-certification of assets up to \$50,000. This would lower barriers to participants in obtaining asset verification.

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.

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.

This waiver parallels the threshold for HOTMA updates.

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

No

Please state the dollar threshold for the self-certification of assets.

\$50,000.

4.b. - Damage Claims (HCV-Tenant-based Assistance) (2023-A-4.b.)**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

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 are 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.

Agency goals for MTW Activity: Increase the number of participating landlords and create increased housing options for HCV families.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted 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.

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.

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

No

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)?

To all units

What is the maximum payment that can be made to a landlord under this policy?

Up to two months contract rent under the HAP contract.

4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance) (2023-A-4.c.)

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 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.

Agency goals for MTW Activity: Increase participating landlords and create increased housing options for HCV families.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted 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.

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.

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

No

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?)

Certain types of units only

What is the maximum payment that can be made to a landlord under this policy?

\$500

5.c. - Third-Party Requirement (HCV) (2023-W-5.c)

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 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.

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.

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.

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 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.

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.

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

No

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

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.

No document is attached.

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 HACC 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.

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

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

The waiver will be implemented according to agency need. 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

What percentage of total authorized HCV units will be authorized for project-basing?

50.00%

9.b. - Increase PBV Project Cap (HCV) (2023-W-9.b)

<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 need. 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> <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, according per the guidance of PIH notice 2017-21.</p> <p>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.</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>

Neutral (no cost implications)
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies to all assisted households
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. The waiver will be implemented according to agency need. 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

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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

Waving 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 voucher 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.

10d Modify or Eliminate the Contract Participation

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

The Housing Catalyst Jumpstart Program would like to apply waiver 10.d.- Modify or Eliminate the Contract of Participation (PH & HCV). HC will modify the FSS Contract of Participation (HUD-52650) to align the program with adjustments made to its MTW FSS Program using MTW flexibility. The contract of participation will be for a five-year period with an optional extension of up to two years and will include escrow deposits based on earned income and goals achieved. HC will be implementing this activity within the safe harbor limits established by the MTW Operations Notice.

FSS Program with MTW Flexibility (PH & HCV)-Certain provisions of sections 23(b)-(d), (f), and (n)(1) of the 1937 Act and 24 CFR 984.105, 984.202(b)-(c), 984.203(a)-(c)(2), 984.303(b)-(d), (f)-(h).

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

Self Sufficiency

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 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?

Housing Catalyst will be following the Safe Harbors designated for these activities: 10.a.-10.e.

Agency must review FSS guidance

The agency must execute a Contract of Participation, or other locally developed agreement that is at least five years but not more than ten years, with each participant in their FSS Program

The agency implementing an FSS program, even with MTW modifications, must have an up to date, approved FSS Action Plan in accordance with 24 CFR 984.201 that incorporates all modifications to the FSS program approved under the MTW contract

The agency must not require MTW FSS Program Participation as a condition for housing subsidy for elderly and disabled families.

If the agency requires MTW FSS Program participation as a condition for housing subsidy, an impact analysis must be developed and adopted in accordance with MTW guidance prior to implementation of the activity.

If the agency requires MTW FSS Program participation as a condition for housing subsidy, a hardship policy must be developed and adopted in accordance with MTW guidance prior to implementation of the activity.

The agency must not make MTW FSS Program participation mandatory for individuals that do not meet the definition of an eligible family at section 23(n)(3) of the 1937 Act, and those exempted from the Community Service Requirement under Section 12.

If an agency terminates the housing subsidy or tenancy of a family for alleged violation of mandatory MTW FSS Program Participant, the family will be entitled to a hearing under the agency's Grievance Procedure (24 CFR part 966, subpart B) or the HCV informal hearing process (24 CFR part 982.555)

The agency must not use income increases during participation in the MTW FSS Program to change a family's eligibility status for purposes of participation in the MTW FSS Program or for the receipt public housing or HCV Assistance.

Is a Hardship or Impact Analysis required:

No

10.e. Policies for Addressing Increases in Family Income (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

Housing Catalyst is authorized to set its own policies for addressing increases in family income during participation in the MTW FSS Program. Consistent with the goals and structure of its MTW FSS Program, the agency may set policies for whether income increases are recognized for purposes of increasing rent (consistent with the agency's existing rent policy) or changing the amount of funds moved to escrow/savings through the program.

FSS Program with MTW Flexibility (PH & HCV)-Certain provisions of sections 23(b)-(d), (f), and (n)(1) of the 1937 Act and 24 CFR 984.105, 984.202(b)-(c), 984.203(a)-(c)(2), 984.303(b)-(d), (f)-(h).

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

Self Sufficiency

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, Any adult voucher holder with employment goals.

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?

Housing Catalyst will be following the Safe Harbors designated for these activities: 10.a.-10.e.

Agency must review FSS guidance

The agency must execute a Contract of Participation, or other locally developed agreement that is at least five years but not more than ten years, with each participant in their FSS Program

The agency implementing an FSS program, even with MTW modifications, must have an up to date, approved FSS Action Plan in accordance with 24 CFR 984.201 that incorporates all modifications to the FSS program approved under the MTW contract

The agency must not require MTW FSS Program Participation as a condition for housing subsidy for elderly and disabled families.

If the agency requires MTW FSS Program participation as a condition for housing subsidy, an impact analysis must be developed and adopted in accordance with MTW guidance prior to implementation of the activity.

If the agency requires MTW FSS Program participation as a condition for housing subsidy, a hardship policy must be developed and adopted in accordance with MTW guidance prior to implementation of the activity.

The agency must not make MTW FSS Program participation mandatory for individuals that do not meet the definition of an eligible family at section 23(n)(3) of the 1937 Act, and those exempted from the Community Service Requirement under Section 12.

If an agency terminates the housing subsidy or tenancy of a family for alleged violation of mandatory MTW FSS Program Participant, the family will be entitled to a hearing under the agency's Grievance Procedure (24 CFR part 966, subpart B) or the HCV informal hearing process (24 CFR part 982.555)

The agency must not use income increases during participation in the MTW FSS Program to change a family's eligibility status for purposes of participation in the MTW FSS Program or for the receipt public housing or HCV Assistance.

i.

Is a Hardship or Impact Analysis required:

No

Expediting Initial Eligibility Income Verification Process

AGENCY SPECIFIC WAIVER:

Full description of activity, including what the agency is proposing to waive

Housing Catalyst proposes waiving provision 24 CFR 982.201(e). This waiver will allow Housing Catalyst to extend the time period in which application documents are valid, from 60 days to 120 days.

Agency goals for MTW Activity: Extending the documentation timeframe will provide administrative relief and cost-effectiveness to HC. With this activity, applicants do not need to continually provide updated documentation if the previously provided information becomes too old (dated older than 60 days) before voucher issuance. This policy creates an administrative burden because in some instances, documentation must be verification a second time before the voucher can be issued (if more than 60 days has passed). Increasing the documentation submission window from 60 to 120 days will eliminate double verification, will facilitate the processing of initial eligibility determination, and accelerate the applicant's access to program participation.

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.

Decrease Expenditures

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

The MTW activity applies to all assisted households ;Any adult voucher holder with employment goals.

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

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 tenant-based units and properties with project-based vouchers

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

No

Does the MTW activity require an impact analysis?

Yes, EXHIBIT C

Does this MTW activity require a hardship policy?

No, per MTW Operations Notice Agency-Specific Waivr requirements, Housing Catalyst has evaluated this activity poses no risk to the continued tenancy of households

Public Hearing Comments to Proposed Activity

D.	Safe Harbor Waivers.
D.1	<p>Will the MTW agency submit request 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>Yes, Housing Catalyst is submitting a request for Agency-Specific Waiver - Expediting Initial Eligibility Income Verification Process</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.
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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>
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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	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
Income Level		Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income		
49%-30% Area Median Income		
Below 30% Area Median Income		
Total Local, Non-Traditional Households		0

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

G.2	Establishing Reasonable Rent Policy.

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/ADDRESSES	0/1 B R	2 B R	3 B R	4 B R	5 B R	6 B R	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.
<p>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.</p>	
	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.	

EXHIBIT A - HARDSHIP POLICY

HARDSHIP 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.

The chart below identifies the MTW activities that could negatively impact assisted families and the groups to which the hardship for each activity will apply.

Hardship Policy
Applies to ALL MTW Activities

This hardship policy presents eligibility criteria and remedies for different types of hardships. The different types of hardships below are not mutually exclusive. If a household's circumstances correspond to more than one type of hardship, they will receive the hardship most beneficial to them.

HARDSHIP POLICIES

- ◆ 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.
- ◆ Approved hardships will take place on the first of the month after the hardship is approved. If there is a delay in determining the hardship, through no fault of the household, HC will make the hardship TTP retroactive to the first of the month following receipt of the verified request.
- ◆ 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.

HARDSHIP TYPES

Tenant Payment as Modified Percent of Income Hardship

- ◆ If the household's TTP exceeds 40% of their monthly adjusted income, a hardship may be requested in accordance with the procedures set forth above.
- ◆ If the hardship is approved, HC will set the households TTP to 40% of their current adjusted monthly income or the minimum rent, whichever is greater.
- ◆ The hardship exemption under this criterion will be for a temporary period of ninety (90) days. The household may request an extension or reapply for another hardship under this criterion

Alternative Reexamination Schedule for Households Hardship

- ◆ The family may request a hardship to request more than one interim recertification within a calendar year.
- ◆ If the hardship is approved, HC will grant an additional voluntary interim recertifications between regular biennial recertifications.

EXHIBIT B - IMPACT ANALYSIS

Activity 1.h – Tenant Payment as a Modified Percentage of Income

Impact on the Agency's Finances

This activity is decrease expenditures by reducing the amount of Housing Assistance Payment (HAP) paid to landlords. Housing Catalyst expects to see expenditures decrease over time and allow HC to support other MTW activities.

Impact on Affordability of Housing Costs for Affected Families

Housing costs are expected to increase slightly for non-exempt households. However, the hardship policies in effect will minimize any extreme impact for families.

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

Tenant rent modified percent of income contributes toward self-sufficiency. This activity will better prepare residents for private market housing in which rent is not tied to household income.

Impact on agency's ability to meet the MTW 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 expected to result in some hardship requests. However, many HCV participants are already paying up to 40% of their monthly income towards rent as they elected a larger unit size than their voucher or simply because they have chosen a higher cost unit.

Impact on Protected classes (and any disparate impact)

Elderly and disabled households are exempt from this activity.

EXHIBIT C - IMPACT ANALYSIS

Expediting Initial Eligibility Income Verification Process

Impact on the Agency's Finances

This activity is decrease expenditures by reducing the frequency in which staff is collecting and verifying data resulting in reduced staff time and cost savings in the initial application process

Impact on Affordability of Housing Costs for Affected Families

This activity will have no impact on affordability of Housing Costs

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 meet the goal of cost effectiveness by reducing the need for mailings and administrative time.

Impact on agency's ability to meet the MTW 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

N/A

Impact on Protected classes (and any disparate impact)

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