



ANN ARBOR HOUSING COMMISSION

DRAFT

**July 1, 2024 – June 30, 2025
One Year Annual Plan
And
MTW Supplement Plan**

Definitions and Acronyms

AAA IB: Ann Arbor Area Agency on Aging.

ACOP: Admissions and Continued Occupancy Policy. The policies and procedures that the Housing Commission has adopted, based on HUD and local regulations, that govern public housing units.

Administrative Plan: The policies and procedures that the Housing Commission has adopted, based on HUD and local regulations, that govern voucher programs.

AMP: Asset Management Project. In 2007, HUD required Housing Authorities with more than 250 units, to organize and manage those units into multiple AMPS. Ann Arbor divided its units into an East and a West AMP.

CAN: Community Action Network. A nonprofit service provider located at the Northside Community Center. The AAHC contracts with CAN to directly serve public housing residents at Hikone and Green Baxter Courts. CAN also received a ROSS grant to serve all public housing residents become self-sufficient.

CSTS: Community Support and Treatment Services. Formerly Community Mental Health. The AAHC contracts with CSTS to provide services to residents primarily at Miller and Baker.

FMR: Fair Market Rent. HUD determines the Fair Market Rent by doing a rental market study and uses the 40th percentile of rental rates by unit size from the previous 2 years (not including new units and subsidized units).

FSS: Family Self Sufficiency program. A HUD program that encourages communities to develop local strategies to help voucher families obtain employment that will lead to economic independence and self-sufficiency.

HAP: Housing Assistance Payment. A HAP contract is executed between the AAHC and a private landlord that has signed a lease with a Section 8 tenant so that the AAHC can pay the landlord a rent subsidy.

HCV: Housing Choice Vouchers. Formerly known as Section 8 vouchers. These vouchers are tenant-based vouchers unless they are specially designated as project-based vouchers. Tenant vouchers are attached to the tenant and provide a rent subsidy at whatever qualified unit a tenant moves to. Project based vouchers are attached to the unit so that any qualified tenant who lives in that unit, receives a rent subsidy.

HQS: Housing Quality Standard. A unit must be inspected to make sure that it meets the HQS standard before a unit is approved for a tenant with a Voucher.

MTW: Moving to Work is a demonstration program for public housing authorities (PHAs) that provides them the opportunity to design and test innovative, locally-designed strategies that use Federal dollars more efficiently, help residents find employment and become self-sufficient, and increase housing choices for low-income families.

PEACE: Peace Neighborhood Center. A nonprofit service provider located on North Maple Road. The AAHC contracts with Peace to directly serve public housing residents at Maple Meadows and North Maple Estates.

PIC: HUD's inventory management system that the AAHC must report to HUD the inventory, condition, and occupancy of the public housing units.

PHA: Public Housing Authority. i.e Ann Arbor Housing Commission

PHAS: Public Housing Assessment System. HUD uses 10 indicators (such as occupancy rate, and accounts receivable from tenants) to monitor and rate Public Housing Authorities across the nation for their public housing properties.

PNA: Physical Needs Assessment. Conducted by an outside contractor to provide a guide to the AAHC on the physical condition of the buildings, the life expectancy of building features such as the roof or boiler, as well as the replacement cost.

ROSS-SC: Resident Opportunity and Self Sufficiency Service Coordinators. This three-year HUD grant will support the AAHC's tenants to earn skills, find employment and become self-sufficient.

SEMAP: Section Eight Management Assessment Program. HUD uses 15 indicators (such as HQS inspections, occupancy rate, and rent reasonableness) to monitor and rate Public Housing Authorities across the nation for their voucher programs (previously Section 8).

City of Ann Arbor Housing Commission			
TOTALS			
Location	Yr Built	# of Units	Addresses
Baker Commons (RAD PBV)	1980	64	106 Packard
Broadway Terrace (PBV)	1956	20	1504 - 1506 Broadway
Garden Circle (Turnkey)	1971	1	2072 Garden Circle
Green Baxter Court (RAD PBV)	1970	23	1701 - 1747 Green Road
Hikone (RAD PBV)	1970	29	2702 - 2760 Hikone
Hillside Manor (PBV)	1996	6	1020 - 1042 Pennsylvania
Creekside (RAD PBV)	2021	32	3421 - 3429 Platt
Mallett's Creek (PBV)	1996	6	2670 -2680 South Main St
Maple Meadows (RAD PBV)	1970	29	800 - 890 South Maple
Miller Manor (RAD PBV)	1971	106	727 Miller
North Maple Estates (RAD PBV)	2016	42	657 - 741 North Maple
North Maple Duplexes (PBV)	1998	4	743 - 749 North Maple
Oakwood (PBV)	1969	3	3565 - 3685 Oakwood
South Seventh (PBV)	1969	8	221 - 253 S. Seventh
Upper Platt (Colonial Square)	1964	5	3681 -3689 Platt
West Washington (PBV)	1969	2	805 - 807 W. Washington
White/State/Henry (RAD PBV)	2021	32	1510 White, 1527 State, & 705 Henry
Lurie Terrace (Senior Housing)	1964	136	600 W. Huron
Siller Terrace	1962	16	1474-1484 Liberty, 1540-1582 Siller, & 528 Virginia
Summation			

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Annual Plan Attachment

Section B.1 Annual Plan Element Proposed Changes FY24

Statement of Housing Needs and Strategy for Addressing Housing Needs.

- A. **Housing Choice Voucher Waiting List.** The AAHC currently has the following preferences: persons with a disability, resident or works in Washtenaw or Monroe County, seniors and homeless. AAHC opened the HCV Waiting List for one month, on August 3, 2020; we received over 3,300 applications. At that time, about 50% of the AAHC's voucher tenants reported as non-elderly disabled households. Below are the demographics as reported by the applicants:

HCV Waiting List

White	742
Black	2269
Asian	28
American Indian	20
Pacific Islander	2
Multiple Race	219
No Identification	0
Hispanic	144
Non-Hispanic	3199
Female	2612
Male	731
Average Annual Income	\$11,427
Average Household Size	2
Near Elderly (Age 55-60)	499
Elderly (Age 62 and older)	225
Disabled	2268
Homeless	1332

- B. **Project Based Voucher Waiting List:** The AAHC currently has the following preferences: persons with a disability, resident or works in Washtenaw or Monroe County, seniors and homeless. AAHC opened the RAD PBV Waiting List for one month, on August 3, 2020. AAHC advertised the opening for one (1) through five (5) bedroom units; and received over 2,200 applications. At that time about 43% of the applicants self-reported as homeless and 35% reported annual income of less than \$10,000. Below are the demographics as reported by the applicants:

PBV Waiting List

White	566
Black	1463
Asian	19
American Indian	12
Pacific Islander	2
Multiple Race	153
No Identification	0
Hispanic	91

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Non-Hispanic	2175
Female	1715
Male	551
Average Household Size	2 Persons
Near Elderly (Age 55-61)	342
Elderly (Age 62 and older)	181
Disabled	1496
Homeless	979
Reported Income between \$1 – \$9,999	35%
Reported Income between \$10,000 – \$19,999	26%

During FY23, the following administrative policies were adopted by the AAHC Board

Admission and Continued Occupancy Plan

13 -OVER-INCOME FAMILIES

For Public Housing residents, AAHC will terminate the tenancies of families who exceed the over-income (OI) limit for at least two consecutive years (24 consecutive months). The family will be considered public housing families and must be offered the option of paying an income-based rent or a flat rent at their next annual reexamination.

Administrative Plan Policies

6: INCOME AND SUBSIDY DETERMINATIONS

AAHC will exclude the Guaranteed Income to Grow Ann Arbor (GIG A2) monthly stipend from the calculation of annual income. GIG A2 is a two-year guaranteed income pilot program that provides monthly payments of \$528 to 100 entrepreneurs with low and very low incomes in Ann Arbor. Guaranteed Income is applicable to Ann Arbor entrepreneur, small business owner, gig worker, or someone with a side job. GIG A2 Arbor would provide \$528 a month for 24 months to support participants well-being, economic stability, or business growth.

15: SPECIAL HOUSING TYPES: SECTION VII: HOMEOWNERSHIP

Participants of the homeownership program, receive homeownership assistance payments in lieu of assistance with monthly rent. The AAHC must adopt policies for determining the amount of homeownership expenses that will be allowed within the voucher payment, in accordance with HUD requirements. Staff recommend the board approval the AAHC to amend the policy to include a monthly allowance of \$300 for major repairs and replacements.

16 - VOLUNTARY USE OF SMALL AREA FMRS

AAHC will voluntarily adopt the use of SAFMRs. We will utilize the SAFMRs for both the tenant-based voucher program and the project-based voucher program for the following zip codes: 48103, 48104, 48105, and 48109, no later than July 1, 2024. The payment standard is 110% of the SAFMR.

17 – PROJECT BASED VOUCHER

If a PHA plans to exceed the cap on the number of units in a project that may have PBV attached for non-elderly families (i.e., the greater of 25 dwelling units or 25 percent of the dwelling units in any

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project), the Administrative Plan must describe the types of services offered to families for a project to qualify for the exception and to the extent to which such services will be provided. The current Administrative Plan now lists the types of services that may be offered to qualify.

In accordance with PIH Notice 2017-21 states that: “The PBV statute defines project as a single building, multiple contiguous buildings, or multiple buildings on contiguous parcels of land. This definition was unchanged by HOTMA. PHAs have discretion to define a project within the parameters of the statutory definition. AAHC defines a project as a single building, or as multiple contiguous buildings, or as multiple buildings on contiguous parcels of land.”

Related to the definition of a suitable location to include areas that have a high-student population. One of HUD’s definitions of a suitable area is one with a poverty level of less than 20%, with some exceptions as described below. Ann Arbor, like other communities with a large population of students in higher education, appear to have high poverty census tracts. All the areas with high poverty census tracts in Ann Arbor are census tracts with high student populations, who self-report their income and are considered temporarily in poverty, and who live in high-cost housing. AAHC revised its definition of suitable location to include a project located in a high-poverty census tract where more than 50% of residents are post-secondary students (college students).

TEMPORARY POLICY SUPPLEMENT: EMERGENCY HOUSING VOUCHER (EHV)

AAHC has amended the Administrative Plan to include the new service fee activities to allow payment for rental arrears, storage expenses, or lock change fees, housing mobility services to encourage move to high opportunity neighborhoods, incentives to owners with accessible units who lease to disabled households, support to families to fulfill their obligations under EHV, and household items such as furniture, toiletries, and cleaning supplies.

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Financial Resources:

2024 Planned Financial Sources and Uses		
Federal Sources:	Planned (Est.)	Planned Uses
Moving to Work Housing Choice Voucher Housing Assistance Payments (HAP) & Admin Fees		HCV and PBV HAP & Admin Expenses
EHP/VASH/FUP Housing Choice Voucher Housing Assistance Payments (HAP)		EHV/FUP/VASH HAP
EHP/VASH/FUP Admin Fees		EHV/FUP/VASH Admin Expenses
Mainstream Voucher Program Housing Assistance Payments (HAP)		HAP Expenses
Mainstream Voucher Admin Fees		Administrative Expenses
Family Self Sufficiency		Family Self Sufficiency program
Other (Fraud Recovery)		Voucher Programs and Central Office
Capital Funds & Operating Funds for Turnkey III		Garden Circle (MI064000100)
Non-federal sources (list below)		
City of Ann Arbor General Fund		Voucher Administration, Central Office,
Affordable Housing Millage		Affordable Housing Development, Tenant Services, and Administrative Expenses
Mental Health Millage Rebate		Tenant Services and Administrative Expenses
Ann Arbor Downtown Development Authority		Development of City-Owned Properties in DDA District
Other Revenue		Property Management Fees
Total resources		

Section B.2 and C.1 New Activities

Moving to Work: AAHC was designated as a Moving-To-Work (MTW) agency in January 2022. MTW is a demonstration program for Public Housing Authorities (PHAs) to design strategies to help residents find or increase employment, become financially self-sufficient and increase housing opportunities for low-income households. The MTW program allows the AAHC more flexibility with how voucher program funds are administered. AAHC was selected for the MTW Landlord Incentives Cohort. AAHC will use the exemption allowed under MTW to establish strategies to increase and continue landlord participation on the HCV program and increase the successful lease-up and long-term housing stability of voucher participants. The MTW program objectives are to reduce costs, give households incentives to achieve economic self-sufficiency, and to increase housing choice. The intent is to serve the same number of low-income families as without MTW funding flexibility. The AAHC will continue to serve a mixture of family sizes. The AAHC will ensure that 75% of the families assisted will have incomes at or below 30% of area median income. All assisted units will continue to meet housing quality standards (HQS). Finally, the AAHC will establish a reasonable rent policy that will encourage self-sufficiency for participating families.

Garden Circle Turnkey III: The AAHC owns a single-family home on Garden Circle, Ann Arbor MI, that was acquired through HUD's Turnkey III lease to ownership program. The Turnkey III program no longer exists and the families that have lived in this home have not been able to purchase the property. The AAHC will dispose of the property through the Section 18 Demo/Dispo Conversion process. The property will be retained by the AAHC by ground leasing the property for \$1 to a wholly owned subsidiary of the AAHC, Colonial Oaks, LLC. The AAHC will project-base a voucher on Garden and offer the current resident the option to continue living at Garden or move with a tenant-based voucher. Colonial Oaks currently includes 49 former public housing units that were converted to project-based vouchers under the RAD program.

Staff held several meetings with the resident between March 2023 and November 2023. If there are any proceeds from the disposition of the property, after deducting the reasonable and necessary costs of disposition, the proceeds will be returned to HUD.

Faircloth to RAD: the AAHC has 3 additional units under the Faircloth regulations that can be developed under the RAD conversion process. The AAHC is exploring the process and best locations to develop 3 additional subsidized housing units at properties it currently owns or is currently developing.

New Development: The Ann Arbor City Council passes a resolution to support an analysis of city-owned properties to determine if they are financially feasible to develop as affordable housing. The analysis was completed by the AAHC, and 10 properties were identified as good locations for affordable housing development. Each site is unique and will have a separate plan for its development. Properties were analyzed based on zoning, regulatory restrictions, environmental conditions, and eligibility for HUD and LIHTC funding. The AAHC spent 2 years on community engagement to understand the priorities of the community and to start discussing site concepts. The properties are in various stages of development as described below.

The City of Ann Arbor passed an affordable housing millage for 1 mil for 20 years, which will raise about \$7 million annually. It is anticipated that the millage will support the development (new

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construction, acquisition, and renovation) of approximately 1500 new affordable housing units for households up to 60% of the Area Median Income (AMI). The millage also allows for up to 20% of the funds to be used for tenant supportive services. The millage is a key component of the development strategy for the 10 city-owned properties to provide gap financing and tenants service funding.

Section B.6 Progress Report

Please see the 4 goals from FY20 – FY24 Plan with a progress report for each goal

- 1) Complete Redevelopment of all public housing units to Project Based Vouchers through the Rental Assistance Demonstration (RAD) project

The AAHC was approved by HUD to redevelop all its public housing to project-based vouchers under the RAD program. Phases 1, 2, 3, 4, & 5 are completed. The single-family Turnkey III home on Garden Circle is the only property that has not converted yet.

- 2) Develop new affordable housing:
 - a. At existing public housing sites
 - b. New properties

a. Through the RAD conversion program, AAHC demolished and built new housing at 3 former public housing properties. A total of 58 new apartments were added through the RAD conversion process. Phase 1, Miller Manor, was redeveloped with three (3) additional apartments. Phase 3 at N. Maple added 23 apartments. Phase 4 at Lower Platt (now known as Creekside Court) added 28 apartments and White/State/Henry (now known as State Crossing) added 4 apartments.

AAHC has begun renovating Garden Circle, the only property not converted under the Rental Assistance Demonstration. Renovations will include rehabilitation of the kitchen and bathroom, addition of a second bathroom, and extensive repair to the basement of the three-bedroom single-family dwelling.

b. AAHC acquired Siller Terrace, a 16-unit two and three-bedroom garden style apartment located in Ann Arbor. The property although, not restricted to a special population such as veterans, seniors, or homeless households; units are restriction to household at 60% AMI or less. Any existing over-income tenants will be grand fathered in, but all new tenants must meet the income-restrictions.

The AAHC has acquired Lurie Terrace, a 136-unit senior apartment in Ann Arbor. The AAHC will be income restricted as well as restricted to households who are 62 years or older. Forty percent of the units will be restricted to households at 60% AMI or less and 60% will be restricted to households at 80% AMI or less. Any existing over-income tenants will be grand fathered in, but all new tenants must meet the income-restrictions.

The following city-owned properties are in the development stage:

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- 121 E. Catherine: Site plan approved for a 63-unit project with 50% of the units reserved for supportive housing and 50% reserved for low-income households in the creative sector. All units would be affordable to households up to 60% AMI.
- 350 S. 5th: Approved zoning and supplemental regulations that require a minimum of 40% (approximately 145) affordable units affordable for households up to 60% AMI in a 2-tower building.
- 415 W. Washington: proposed residential building with about 125 units, 15% of which would be affordable to households up to 60% AMI or a cash contribution to the Affordable Housing fund in lieu of including units on site.
- 2000 S. Industrial: proposed mixed-use site including residential and City uses such as offices, storage, and fleet services
- 1510 E. Stadium: conducting due diligence
- 721 N Main (123 W Summit): Lot was split so that the buildable portion is separate from the portion in the floodway.
- 404 N Ashley: on hold until building is vacated
- 353 S Main: Public sewer line extended to site to support future development
- 309 S. Ashley: no activity to report
- Platt/Springbrook: no activity to report

3) Project-Based Voucher:

Increase the number of Project-Based Vouchers in the City of Ann Arbor and other communities in Washtenaw County that have a strong economic base and public transportation. AAHC projects that we will convert about 200 vouchers to project-based vouchers by FY25.

In addition, 23 VASH vouchers for chronically homeless veterans were project-based through a partnership with the VA.

a. Addition of PBV Units:

- i. The AAHC issued Project-Based Voucher RFP on September 9, 2020, for up to 150 vouchers in the City of Ann Arbor. The AAHC received applications for 162 project-based vouchers. The AAHC has entered into agreement for 79 vouchers within Ann Arbor for the following projects: 33 vouchers at 100 S. 4th Ave 48104, 30 vouchers at 600 W. Huron 48104, 10 vouchers at 2270 Platt Road 48108, and 6 vouchers at 100-106 and 112-114 Glendale 48103.
- ii. The AAHC issued a Project-Based Voucher RFP on February 2, 2023, for up to 175 vouchers in the City of Ann Arbor. The AAHC received applications for 50 project-based vouchers. The AAHC conditionally approved 50 vouchers with the following projects: 18 vouchers Hickory Way III and 32 vouchers 121 E Catherine.
- iii. The AAHC issued a Project-Based Voucher RFP on October 18, 2023 for up to 50 vouchers. **The AAHC conditionally approved ?**

- b. Statement of need Consistent to PHA Plan: AAHC will project-base up to 20% of the AAHC's budget authority to de-concentrate poverty and expand housing and economic opportunities for very low-income, homeless, and special needs households in the City of Ann Arbor and other high opportunity areas in Washtenaw County. The AAHC

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prioritizes PBV on Permanent Supportive Housing units. These activities are consistent with the AAHC's 5-year and Annual Plan as well as AAHC's mission.

- 4) Increase supportive housing for residents with complex needs spanning from homelessness, mental illness, substance use disorders, and/or other physical/mental disabilities.
 - a. Increase support services for tenants in affordable housing and voucher program
 - b. Through community partnerships
 - c. Additional funding sources
 - d. Continue to work with partners and provide support to eligible families

Continuum of Care (CoC)

The AAHC partnered with Avalon Housing and Ozone House to provide housing and services to chronically homeless individuals and families through the HUD Continuum of Care program. A minimum of 59 of these households will be housed at AAHC properties and Avalon and Ozone House will be providing on-site services. These funds have enabled Avalon to provide 24/7 services at Miller Manor. In FY21, all of the CoC grants have been transferred to Avalon Housing to administer.

Support Service HCV Eviction Prevention

The AAHC is partnering with SOS to hire a case manager to help AAHC voucher tenants maintain their vouchers.

The coordinated support service allows assist families to lease up in Ann Arbor and resolve landlord/tenant issues such as securing funds to avoid eviction and/or assistance with securing funds for outstanding utility bills and were able to retain their housing. AAHC will continue contracting services with SOS to provide voucher families assistance in maintaining their assistance.

Support Service On-site PBV

The AAHC partnered with Avalon Housing & Peace Neighborhood Center & Community Action Network to provide on-site services for tenants at West Arbor, Miller Manor, Maple Meadows, Hikone, Green-Baxter, and Baker Commons.

The AAHC is partnering with CAN and Avalon to provide on-site services at the new State Crossing and Creekside Court Community Centers, respectively.

The AAHC is partnering with Huron Valley PACE to provide on-site services at the newly acquired senior housing property, Lurie Terrace.

Additional Voucher Support Services

The AAHC is partnering with Avalon Housing and Michigan Ability Partners to assist AAHC voucher waitlist applicants lease up successfully and to provide ongoing support services.

Family Unification Program (FUP)

The AAHC has partnered with the Michigan Department of Health and Human Services (MDHHS), Washtenaw County Continuum of Care (CoC), and Ozone House to provide

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housing assistance to 32 families for the HCV Family Unification Program. AAHC continues to provide housing to eligible families.

The Family Unification Program (FUP) is a program under which Housing Choice Vouchers (HCVs) are provided to two different populations: Families for whom the lack of adequate housing is a primary factor in: the imminent placement of the family's child or children in out-of-home care, or the delay in the discharge of the child or children to the family from out-of-home care. In addition, Eligible youths who have attained at least 18 years and not more than 24 years of age and who have left foster care, or will leave foster care within 90 days, and is homeless or is at risk of becoming homeless at age 16 or older.

In addition to rental assistance, supportive services must be provided by the MDHHS to FUP youths for the entire 18 months in which the youth participate in the program; examples of the skills targeted by these services include money management skills, job preparation, educational counseling, and proper nutrition and meal preparation.

Non-Elderly Disabled Mainstream Voucher (NED)

The AAHC has partnered with 11 agencies to administer the NED Voucher program, all of whom serve persons with disabilities as a cornerstone of their non-profit mission or public agency purpose. HUD awarded AAHC 45 voucher for the NED program in 2018; 90 vouchers in 2019; and 41 vouchers in 2020. AAHC continues to provide housing to eligible families.

NED HCVs enables non-elderly disabled families to lease affordable private housing of their choice. NED vouchers also assist persons with disabilities who often face difficulties in locating suitable and accessible housing on the private market. The target population for the NED program are any household that includes one or more non-elderly person with disabilities.

In addition, eligible families included non-elderly persons with disabilities who are transitioning out of institutional or other segregated settings, at serious risk of institutionalization, currently experiencing homelessness, or those at risk of experiencing homelessness.

Emergency Housing Vouchers

AAHC received an award of 29 Emergency Housing Vouchers (EHV) effective July 1, 2021. The Emergency Housing Voucher (EHV) program is available through the American Rescue Plan Act (ARPA). Through EHV, AAHC assist individuals and families who are homeless, at-risk of homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or were recently homeless or have a high risk of housing instability.

AAHC works with the CoC and its other homeless services/victim services referral partners in determining which activities it will undertake in support of EHVs participants. Activities such as housing search assistance, assistance with security deposit, utility deposit, rental application, holding fees, and other related uses are intended to prevent and respond to housing instability.

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Additional Vouchers

AAHC received 22 new voucher increments from HUD; 16 in October 2022, and 6 in August 2023. Due to a competitive rental market around the country, it's increasingly becoming necessary to help families lease units. As a result, HUD revisited its current guidance on the eligible uses of administrative fees allowing PHA's to expanding such activities to cover costs that encourage housing stability for participants. To ensure success, AAHC administers funds directly to our partners that provide services to participating families that fit their specific needs.

Administrative activities also include housing search assistance activities such as pre-move counseling, helping a family identify and visit potentially available units during their housing search, helping a family find a unit that meets the household's disability-related needs, providing transportation and directions, and assisting with the completion of rental applications. These activities also include post-lease up activities often related to housing search assistance efforts, such as post-move counseling and landlord/tenant mediation. These activities cover HCV owner recruitment and outreach activities, including the costs associated with materials or webpages specifically geared to owners, as well as landlord liaison staff and associated expenses.

City of Ann Arbor General Fund Support

The City of Ann Arbor allocated \$525,000 in FY20; \$535,000 in FY21; \$546,000 in FY22 and over \$1.1 million in FY23 for tenant mental health and other supportive services for AAHC tenants and Voucher program participants. These funds are partially funding the programs listed above.

Section B.7 Resident Advisory Board

The Resident Advisory Board (RAB) held on November 9, 2022

This annual public, meeting of the Resident Advisory Board focused on the AAHC's Annual Plan and HUD's Moving To Work (MTW) Demonstration Program as a member of Cohort #4— Landlord Incentives.

ATTENDEES: Weneshia Brand (AAHC), Arin Yu (AAHC), Terrance Heiligh (AAHC), Alacia Upthegrove, and Sherry Ragay.

DISCUSSION:

Upthegrove: Mentioned that increase the voucher subsidy would be helpful to program participants. She mentions that she needs a six-bedroom house and that there very little housing options available to participants.

Upthegrove: Asked if her voucher amount would increase because she's adding another member to the household?

Brand: Voucher are issued for one bedroom for every two people in the household. You caseworker can provide specific detail regarding your household.

Ragay: Asked what is the average wait on the programs waiting list?

Brand: The average wait is 4 to 6 years for our Affordable Housing or Housing Choice Voucher waiting list.

Ragay: Mentioned that her son has applied for the waiting list. He is currently homeless and needs his own place.

Brand: AAHC staff can be reached for additional comments and questions at www.a2gov.org/housingcommission

Landlord Incentives

AAHC is a participant in Moving To Work Cohort #4— Landlord Incentives. Participation in this cohort provides AAHC the opportunity to adopt policies that incentivize landlord participation in the Section 8 Voucher program. AAHC plans to provide damage loss payments, signing bonuses, and vacancy loss payments to landlords that rent to Section 8 Voucher participants. AAHC also plans to assist participants with providing security deposits and paying application fees.

The Ann Arbor Housing Commission discussed the Final Rule implementing Sections 102, 103, and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA) regulation changes for future adoption, with the Resident Advisory Board:

Section 102: Income Reviews

Fewer Interim Reexaminations: HOTMA creates a 10% adjusted income increase/decrease threshold for conducting Interim Reexaminations, and in most cases requires that increases in earned income are not processed until the next Annual Reexamination, allowing families to keep more of their earnings before receiving a rent increase. The new requirements should lead to fewer Interim Reexaminations overall, alleviating burden for both participants and PHAs.

Streamlined Verifications: Several provisions will streamline the verification process for housing providers.

Adults Only Need to Sign Consent Form Once: HOTMA revises the required consent form that all adult household members sign, allowing them to sign the form only once instead of annually.

Use of Income Determinations from Other Programs: HOTMA allows PHAs to use income determinations made under other federal benefits programs for reexaminations.

Review of EIV Not Required at Interim Reexamination: HOTMA eliminates the requirement for PHAs to use EIV to verify tenant employment and income information during an interim reexamination, significantly reducing administrative burden.

Increased Standard Deduction for Elderly/Disabled Households: HOTMA increases standard deductions for families with a head, co-head, or spouse who is elderly or a person with a disability.

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Additional Income Exclusions: The rule codifies additional income and asset exclusions, including:

- Amounts received from Medicaid or other state/local programs meant to keep a family member with a disability living at home
- Veterans' aide and attendant care
- Distributions of principal from non-revocable trusts, including Special Needs Trusts.

Threshold for Claiming Medical/Disability Expenses Increased: HOTMA increases the allowance for unreimbursed health and medical care expenses from 3% of annual income to 10%, phased-in over two years.

Higher Threshold for Imputing Asset Income: HOTMA raises the imputed asset threshold from \$5,000 to \$50,000, incentivizing families to build wealth without imputing income on those assets.

Hardship Relief: HOTMA provides hardship relief for expense deductions, lessening the impact of the increased threshold for medical expenses. HOTMA permits PHAs to grant hardship relief to families unable to pay rent because of unanticipated medical/disability expenses and families who are no longer eligible for the childcare expense deduction.

Section 103: Public Housing Income Limit

Public Housing Income Limitation: HOTMA imposes continued program participation limits for families exceeding the statutory income limitation in the Public Housing *program, also known as the "over-income" provision.

Section 104: Asset Limits

Asset Limitation: HOTMA imposes a \$100,000 asset limit for eligibility and continued assistance. Families are also ineligible for assistance if they own real property suitable for occupancy. PHAs have the option of delaying enforcement/termination for up to six months if the family is over the asset threshold at the time of annual reexamination.

Exclusion of Retirement and Educational Savings Accounts: Retirement accounts and educational savings accounts will not be considered a net family asset. This is a major benefit to families, incentivizing savings for important life milestones and opportunities. This will also provide significant administrative relief to PHAs by allowing them to stop verifying and calculating these assets altogether.

Self-Certification of Assets under \$50,000: HOTMA allows self-certification of net assets if estimated to be at or below \$50,000. This will be a time-savings for families and lower administrative burden for PHAs recertifying income.

Cross-Cutting

Adjustments for Inflation: Deductions and the asset limitation will be adjusted for inflation annually, ensuring that deductions do not lose value over time and that families are able to build more wealth without losing program assistance. The current deduction amounts have never been adjusted.

Resident Advisory Board Discussion:

AAHC FISCAL YEAR 2024 DRAFT ANNUAL PLAN

OTHER RESIDENT INPUT: *None*

CHALLENGED ELEMENTS TO PLAN: *None*

PHA Name : Ann Arbor Housing Commission

PHA Code : MI064

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2024

PHA Program Type: Combined

MTW Cohort Number: Landlord Incentives

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The Ann Arbor Housing Commission is deeply committed to providing excellent housing opportunities to current and future residents of Washtenaw and Monroe Counties. Within our jurisdiction exists immensely diverse communities, ranging from the dense urban centers of Ann Arbor and Ypsilanti, to the more sparsely populated townships of Superior and Scio. Many of these neighborhoods are complimented by strong school systems, low poverty rates, and desirable housing, while other neighborhoods are challenged by limited public services and diminishing economic opportunity. As a Moving To Work agency, we hope to increase housing choice in some of our highest opportunity and more economically exclusive communities. It is our belief that the MTW program will aid in our efforts to increase housing stability for our most vulnerable community members and allow us to establish long-term relationships with private sector housing providers. As AAHC continues to take major steps towards developing new affordable housing, our MTW activities will serve as an additional tool to provide more desirable housing for those most in need.

Cost Effectiveness:

AAHC is eager to employ the funding and programmatic flexibility that MTW provides in order to more efficiently utilize its federally allocated funds. Our administrative processes, supportive services, and development projects will all benefit from MTW allowances and activities. The AAHC is actively partnering with local nonprofits, public agencies and local governments to increase the supply of affordable housing in the City of Ann Arbor, Washtenaw County, and Monroe County through financial tools, development of affordable housing on public property, project-based vouchers, zoning regulations and other public policy tools. AAHC plans to use MTW flexibilities to fund the programs and projects that it determines will be of the greatest benefit to our communities and incentivize potential partners to assist in our goal of increasing housing opportunity. Additionally, specific waivers such as those related to HQS inspections offers AAHC the opportunity to cut down on unnecessary staff time and rededicate itself to tasks that are of more immediate importance.

Self-Sufficiency:

AAHC partners with many local non-profits, mainstream service providers, and the private sector to build healthy residential communities and promote an atmosphere of pride and responsibility. The AAHC has contracts with 7 non-profit agencies to provide on-site support service to tenants who live in AAHC properties. The AAHC has a contract with SOS Community Services to provide eviction prevention services to all the AAHC's voucher tenants. A recent internal analysis of supportive services offered at AAHC properties indicated their tremendous effectiveness at preventing eviction and providing housing stability; outcomes among formerly homeless households were especially encouraging as compared to national trends. The AAHC has MOUs with many local agencies to assist homeless and disabled applicants complete the application process, search for housing, and successfully lease-up. The AAHC also works directly with the Michigan Works! agency to leverage employment and training opportunities for program participants. Additionally, AAHC works with private companies, local non-profits, and Habitat for Humanity to increase participation in the AAHC's Homeownership Program. The AAHC partners with the United Way to provide support services aimed at empowering families to build savings and financial capabilities as a pathway out of poverty. The AAHC also participates in HUD's Family Self Sufficiency Program. As an MTW agency, AAHC has the opportunity to divert funding to many of the aforementioned programs and partnerships. AAHC will continually analyze the effectiveness and financial state of these programs in order to determine how to best allocate funding to each of them.

Increasing Housing Choice:

According to the Martin Prosperity Institute's 2015 report "Segregated City, The Geography of Economic Segregation in America", Washtenaw County is the 8th most income segregated County in the United States. Low-Income residents in Washtenaw County have limited opportunities for mobility due to the high housing costs throughout the county, especially in high opportunity areas. The MTW designation can help the AAHC provide more numerous and more desirable choices through higher payment standards and landlord incentives to expand our pool of participating landlords. HUD has recognized a growing number of populations with specific needs that often go unmet by the existing housing infrastructure. AAHC's goal is to develop programs and housing stock targeted to the most underserved populations. In pursuit of this goal, we currently administer several special purpose voucher programs in addition to the Housing Choice Voucher and Project Based Voucher programs. AAHC recognizes the significant and immediate need for additional affordable housing. A recent market analysis for the City of Ann Arbor shows a market demand for 1,300 units at 30% AMI, 700 units at 31% to 60% AMI and 300 units at 61% to 100% AMI just in the downtown area. AAHC is looking to increase the housing opportunities through partnerships, private/non-profit development, acquisition, and utilizing programs such as MTW. The Corporation for Supportive Housing (CSH) recently completed a needs analysis for Permanent Supportive Housing for all of Washtenaw County and determined that in the next 10 years an additional 1,581 PSH units for single adults and 407 PSH units for families are needed. The AAHC currently has a homeless preference for its waitlist and partners with the Continuum of Care and multiple non-profits to house homeless households in AAHC PBV units as well as with tenant-based vouchers. The AAHC and its community partners work hard to create programs and opportunities for homeless households to live in low-poverty, high opportunity neighborhoods.

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

1. Tenant Rent Policies	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Currently Implementing
b. Payment Standards- Fair Market Rents (HCV)	Currently Implementing
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Not Currently Implemented
b. Alternative Reexamination Schedule for Households (HCV)	Not Currently Implemented
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Not Currently Implemented
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Currently Implementing
b. Damage Claims (HCV-Tenant-based Assistance)	Currently Implementing
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Currently Implementing
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Plan to Implement in the Submission Year
6. Short-Term Assistance	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	

Increase Elderly Age (PH & HCV)	Not Currently Implemented
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Not Currently Implemented
b. Increase PBV Project Cap (HCV)	Not Currently Implemented
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
10. Family Self-Sufficiency Program with MTW Flexibility	
a.PH Waive Operating a Required FSS Program (PH)	Not Currently Implemented
a.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b.PH Alternative Structure for Establishing Program Coordinating Committee (PH)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented
c.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.PH Modify or Eliminate the Contract of Participation (PH)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
11. MTW Self-Sufficiency Program	
a.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
12. Work Requirement	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
14. Moving on Policy	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
15. Acquisition without Prior HUD Approval (PH)	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
16. Deconcentration of Poverty in Public Housing Policy (PH)	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
17. Local, Non-Traditional Activities	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented

C. MTW Activities Plan that Ann Arbor Housing Commission Plans to Implement in the Submission Year or Is Currently Implementing

2.a. - Payment Standards- Small Area Fair Market Rents (HCV)
<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>Adopt and implement a reasonable policy to establish payment standards based upon Small Area Fair Market Rents (SAFMR). AAHC seeks to increase housing opportunity for program participants. This MTW activity contributes to the. AAHC seeks to improve relationship with landlords, ensure our efforts matches those of the local market, recruit and retain landlord participation, apply measure to offset rent burdens, and encourage move to high opportunity areas.</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>After establishing payment standards using SAFMR, participants residing in high opportunity areas have increased. In addition, rent burden decreased for those participants who previously lived in those low poverty areas.</p>
<p>Does this MTW activity require a hardship policy?</p> <p>Yes</p> <p>This document is attached.</p>
<p>Does the hardship policy apply to more than this MTW activity?</p> <p>Yes</p>
<p>Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</p> <p>2.b. - Payment Standards- Fair Market Rents (HCV)</p>
<p>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</p> <p>No</p>
<p>How many hardship requests have been received associated with this activity in the past year?</p> <p>No hardship were requested in the most recent fiscal year.</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>Yes</p> <p>This document is attached.</p>
<p>Does the impact analysis apply to more than this MTW activity?</p> <p>Yes</p>
<p>Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)</p> <p>2.b. - Payment Standards- Fair Market Rents (HCV)</p>
<p>Please explain the payment standards by ZIP code or "grouped" ZIP codes:</p> <p>AAHC established payment standards based upon the SAFMR for the following ZIP codes: 48103, 48104, 48105, and 48109.</p>

<p>2.b. - Payment Standards- Fair Market Rents (HCV)</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>Our agency established payment standards based upon 120% of the Fair Market Rents (FMR). The MTW activity will reduce rent burden of current participants and increase housing opportunities. Our agency intends to utilize this MTW activity to match local rental markets in an effort to retain and recruit landlord participation in the HCV program.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness; 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>Our agency has retained several landlords and reduced rent burden after implementing this activity.</p>
<p>Does this MTW activity require a hardship policy?</p> <p>Provided Already</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>Provided Already</p>
<p>Please explain the payment standards by FMR:</p> <p>The payment standard is set at 120% of the FMR within the PHA jurisdiction of Washtenaw and Monroe Counties; including those designated areas where the payment standard would be lower if the agency established a payment</p>

standard based on the SAFMR.

4.a. - Vacancy Loss (HCV-Tenant-based Assistance)

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

AAHC offers incentives to participating landlords by providing vacancy payments to the owner. Our goals is to retain and increase the number of landlords it is working with and expand into new neighborhoods. We intend to address specific landlord issues such as, reluctance to join the HCV Program due to delays in leasing and costly repairs, in a effort to build and improve partnership between the landlord and PHA.

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 only to a subset or subsets of 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?

Currently assisted households only

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 units and properties with project-based vouchers?

The MTW activity applies to all tenant-based units

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 implementing this activity the number of inquires from new owners have increased. In addition, current owners are less incline to end their participation in the HCV program.

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?

Payments made to the landlord must be equal to no more than one month of the contract rent.

How many payments were issued under this policy in the most recently completed PHA fiscal year?

What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?

\$1,800

4.b. - Damage Claims (HCV-Tenant-based Assistance)

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

AAHC encourage landlord participation by providing for compensation payments to the owner when the HCV participant causes damage to the unit. Our goals is to retain and increase the number of landlords we're working with and expand into new neighborhoods. We intend to address specific landlord issues such as, reluctance to join the HCV Program due to delays in leasing, costly repairs, in a effort to build and improve partnership between the landlord and PHA.

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 only to a subset or subsets of 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?

Currently assisted households only

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 units and properties with project-based vouchers?

The MTW activity applies to specific 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.

This activity applies to all current tenant based voucher participants and project-based voucher participants.

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 the agency has implemented this MTW activity we have retained several landlords who participant in the HCV program.

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?

The amount of damage claims must not exceed the lesser of the cost of repairs or two months of contract rent. In implementing this activity, the participant's security deposit must first be used to cover damages and the agency may provide up to two months of contract rent minus the security deposit to cover remaining repairs.

How many payments were issued under this policy in the most recently completed PHA fiscal year?

31

What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?

\$26,908

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

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

AAHC provides incentive payments such as security deposit, application fees, and signing bonus to participating landlords. Incentive payments are used in order to recruit new landlords to join the HCV program. By implement this activity we intend to increase housing choice for program participants.

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 only to a subset or subsets of 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 units and properties with project-based vouchers?

The MTW activity applies to specific 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.

This activity is available to both tenant-based and project-based participants.

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 implementation of this MTW activity, AAHC has initiated HAP contracts with new owners.
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? Payments made to the landlord must be equal to no more than one month of the contract rent.
How many payments were issued under this policy in the most recently completed PHA fiscal year? 40
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year? \$19,230

5.d. - Alternative Inspection Schedule (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 AAHC will complete units inspections at least once every three years. This activity will
Which of the MTW statutory objectives does this MTW activity serve? Cost effectiveness
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. AAHC intends to implement triennial HQS inspections.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No

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>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>

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2023	\$7,683	\$7,683	\$0	2023-06-30

G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
Income Level		Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income		0
49%-30% Area Median Income		0
Below 30% Area Median Income		0
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.
<p>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency? No</p> <p>Please describe the MTW agency's plans for its future rent reform activity and the implementation timeline. MTW agency did not established a rent reform policy to encourage employment and self-sufficiency AAHC will review the options available and select one of the MTW Activities.</p>	

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

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

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

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

ANN ARBOR HOUSING COMMISSION

MTW HARDSHIP POLICY – MULTIPLE ACTIVITIES

The PHA has a written policy for determining when a requirement or provision of a program regulation or MTW activity constitutes a financial or other hardship for the family. This hardship policy is applicable for MTW HCV households as well as non-MTW HCV households.

The policy applies to the follow MTW activities: SAFMR Payment Standard, and FMR Payment Standard. In addition, to the MTW activities the policy applies the non-MTW minimum rent waiver and repayment agreement policy, in accordance with HUD regulation.

PHA Policy

The PHA will review its hardship policy(s) with residents during its intake, and recertification processes. The resident must sign and submit consent forms for obtaining information requested by the PHA necessary to consider if a resident qualifies for a hardship exemption.

The PHA will determine if a resident qualifies for a hardship exemption under the following circumstances:

1. At the time of a potential termination of assistance that is due to an MTW activity
2. When a resident request a hardship exemption from a required MTW activity

The PHA will suspend the activity for the household, beginning the next month after the request, until the PHA has determined if the request is warranted. The PHA shall make determination of whether a financial or other hardship exists within thirty (30) days after the family's request.

Hardship Standard

The PHA will determine what constitutes a hardship. A family may request a hardship for the following circumstances. The family must experience a decrease in income because of changed circumstances, family emergency, divorce, or natural disaster:

1. Loss or reduction of employment
2. Loss of income due to death of the head, spouse, or co-head
3. Reduction in or loss of earnings or other benefit income
4. Awaiting approval for benefit income
5. Such other situations and factors as determined by the agency to be appropriate, such as eviction, termination of utilities, or wage garnishment, divorce, natural disaster, or family emergency.

Exemption Period

If it is determined a qualifying hardship does not exist, the MTW activity will resume. Any amounts owed to the PHA due to the suspension of the MTW activity will be collected through a reasonable repayment agreement.

When a family's request for a financial hardship exemption (other than alternative reexamination schedule) is granted, the PHA will remove the family from the MTW initiative for a period of 6 months.

The hardship will be reassessed on **the earlier of** the next scheduled biennial recertification or within 6 months from the date the hardship was approved.

The hardship period ends when at an interim or annual reexamination, the family's calculated MTW TTP is greater than the TTP as calculated under the hardship exemption.

For a minimum rent hardship exemption based upon hardship-related expenses, the minimum rent exemption will continue to be recognized until the cumulative amount exempted is equal to the expense incurred.

If the family disagrees with the denial of a hardship request, the family is entitled to and may request an informal hearing.

Reasons of Denial

Hardship request may be denied for the following reasons:

1. Failure to provide verification for loss or reduction of benefit income
2. Failure to provide verification for eligibility of benefit income
3. Failure to provide verification of increased expenses
4. Family is not subject to eviction, utility shut off, or wage garnishment
5. Failure to submit verification for decrease or loss of employment
6. Failure to provide supporting documentation related to loss of income due to death by head, spouse, or co-head
7. Failure to provide supporting documentation related to divorce, natural disaster, or family emergency.

Grievance Procedure

A family may request for second level review of denied hardship requests. The family must submit a request in writing within 30 days the of the PHA written notice.

Reporting

The PHA will keep of all hardship requests received and the results of these requests and supply them at HUD's request. Requests related to the PHA's MTW status will be retained for the duration of PHAs participation in the MTW demonstration program and will be available for public review and inspection at the principal office location during normal business hours.

SAFMR AND FMR Payment Standard Impact Analysis

This analysis must consider the following factors, as applicable:

MTW Activity: Reasonable Rent Policy (2.a.) Payment Standard – SAFMR and (2.b.) Payment Standard FMRs
2.a. The agency is authorized to adopt and implement any reasonable policy to establish payment standards based up Small Area Fair Market Rents (SAFMR) and Fair Market Rents (FMR). 2.a.i. Payment standard must be between 80% and 150% of the SAFMR. 2.b.i. Payment standard must be between 80% and 120% of the FMR
Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution);
AAHC does not anticipate that the implementation of these waivers will have a significant impact on staff time. Initial calculations regarding HAP and payment standards for affected families may require a bit more time from our financial staff during the first stages of implementation, but we predict that these effects will be lessened as we continue to issue vouchers using SAFMR and newly adjusted payment standards over time. Average HAP contributions from AAHC will likely increase following the implementation of this waiver. The adoption of new payment standards according to SAFMR will allow for HCV families to move into more desirable, higher opportunity, and more expensive areas of our community.
Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs);
AAHC does not anticipate an increase how much affected families will pay toward their housing cost.
Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist);
Although it is hard to determine, we anticipate there will be no change in the amount of time families are on the waiting list. AAHC will monitor this activity closely to determine its impact.
Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency);
Although it is hard to determine, we anticipate there will be no change in the number of families that are terminated. AAHC will monitor this activity closely to determine its impact.
Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program;
AAHC anticipates that the implementation of these waivers will increase our HCV utilization rate. We expect to increase our number of HCV units following implementation, and therefore similarly expect our utilization rate to increase.
Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice;
Implementation of the activity is cost effective because it reduces administrative burden and improves efficiency. This activity supports the MTW statutory objective of increasing housing choice.
Impact on the agency's ability to meet the MTW statutory requirements;

This activity does not impact our ability to ensure that 75% of all new admissions are very low-income. AAHC will monitor new admissions and current participants to ensure continued assistance for substantially the same total number of eligible low-income households with MTW designation as without MTW designation.

In addition, AAHC will closely monitor assisted households to assure continual assistance to a comparable mix of household by family size. Lastly, this activity has no negative impact of the agency ability to ensure all housing assisted under the MTW demonstration meets Housing Quality Standards.

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

AAHC does not anticipate an impact on the number of hardship requests, granted or denied. AAHC has established a hardship policy. We anticipate no more than 10% of assisted families will request a hardship. AAHC will grant all requests that meet the eligibility criteria and deny all others. Overall, AAHC does not anticipate the rate of hardships having a significant impact on the agency or participating families.

Across the other factors above, the impact on protected classes (and any associated disparate impact).

AAHC can ensure there will not be an impact on protected classes or any associated disparate impact. The agency will monitor the program to ensure that these programs do not adversely affect participation in, benefits of, or otherwise discriminate against persons on the basis of race, color, national origin, sex, religion, familial status, or disability or other protected bases. The agency's programs shall be operated in a manner that is consistent with the requirements of nondiscrimination and equal opportunity authorities, and will be accessible to persons with disabilities in accordance with the Fair Housing Act, section 504 of the Rehabilitation Act, Titles II and III of the Americans with Disabilities Act, as applicable, and the Architectural Barriers Act.

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

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

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

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

MTW PHA NAME

MTW PHA NUMBER/HA CODE

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

NAME OF AUTHORIZED OFFICIAL

TITLE

SIGNATURE

DATE

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