

AAHC DRAFT FISCAL YEAR 2023 ANNUAL PLAN

Annual Plan Attachment

Section B.1 Annual Plan Element Proposed Changes FY22

Statement of Housing Needs and Strategy for Addressing Housing Needs.

- A. The AAHC currently has the following preferences persons with a disability, residential, seniors and homeless. About 50% of the AAHC’s voucher tenants are non-elderly disabled households. AAHC opened the HCV Waiting List for one month, on August 3, 2020; we received over 3,300 applications. 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. The AAHC currently has the following preferences persons with a disability, residential, 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; we received over 2,200 applications. About 43% of the applicant self-reported as homeless and 35% reported annual income of less than \$10,000. Below are the demographics as reported by the applicants:

RAD PBV Waiting List

White	566
Black	1463
Asian	19
American Indian	12
Pacific Islander	2
Multiple Race	153
No Identification	0
Hispanic	91
Non-Hispanic	2175
Female	1715

AAHC DRAFT FISCAL YEAR 2023 ANNUAL PLAN

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%

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.

During FY22, the following Administrative policies were adopted by the AAHC Board

Administrative Plan Policies

5-BRIEFING AND VOUCHER ISSUANCE

When HCV participant are issued a voucher the regulation states that the voucher must be utilized before it expires. HUD requires the initial voucher term must be at least 60 days. HUD allows the PHA to establish a policy to determine the length of the voucher term. The previous AAHC policy stated that the voucher term would be 60 days (not including any extensions). AAHC amended the policy to allow a minimum of 180 days voucher term with a maximum of 240 days as a reasonable accommodation for persons with disabilities or in extenuating circumstances.

9-GENERAL LEASING POLICY: TERM OF ASSISTED TENANCY

HUD requires to establish a general leasing policy that states the term of the tenant lease. The regulation permits the PHA to allow a lease term less than 12 months under certain conditions. AAHC amended the policy to allow families to enter a lease with a landlord shorter than 12 months to improve housing opportunities for the tenant in areas with a shorter lease term has become a regular practice in the market.

10-MOVES WITH CONTINUED ASSISTANCE

When an HCV applicant or participant request to move outside of the PHA jurisdiction that family may be denied a request for several reasons such as owing a debt to the PHA. The AAHC policy previously allowed the family to move under the establishment of a repayment agreement. AAHC amended the policy to require the family to resolve all debts owed to the PHA prior to moving outside the PHA jurisdiction.

15-INTRODUCTION: SPECIAL HOUSING TYPES

Previously, the policy restricted voucher participants to reside in units qualifying as special housing types as a reasonable accommodation only. The AAHC amended the policy to allow all households will be permitted to live in any special housing types and a reasonable accommodation will not be necessary.

16-PROGRAM ADMINISTRATION: INFORMAL REVIEWS AND HEARINGS

AAHC added language to the administrative plan to make it clear that applicants and participants who voluntarily withdraw from housing choice voucher programs are not entitled to an informal review or informal hearing. Applicants and participants would continue to have the right for an informal review and informal hearing when the AAHC initiates the denial of assistance or termination, as required under federal regulations.

16-PROGRAM ADMINISTRATION: EMERGENCY TRANSFER

AAHC amended its Emergency Transfer policy to clearly define the eligibility requirements for families requesting to transfer, create a distinction between VAWA related transfers and non-VAWA related transfers, and lastly to establish procedures for participants requesting to transfer under those specific circumstances.

19-FAMILY SELF-SUFFICIENCY PROGRAM: PROGRAM OPERATIONS

The AAHC amended its policy that describe the handling of balances owed to the Housing Authority or Section 8 lease and the treatment of unreported income as it is related to FSS Escrow monthly disbursements. The policy clearly states that families will not escrow excess amounts resulting from increases in income that we previously unreported by the family. In addition, the policy clearly states that any amounts owed to the AAHC or HCV owner will be deducted from the FSS escrow balance.

AAHC DRAFT FISCAL YEAR 2023 ANNUAL PLAN

Financial Resources:

2023 Planned Financial Sources and Uses		
Federal Sources:	Planned (Est.)	Planned Uses
Housing Choice Voucher/VASH/FUP Housing Assistance Payments (HAP)	Will be updated at a later date	HCV and PBV HAP Expenses. including RAD PBV, FUP and VASH
Housing Choice Voucher Admin Fees	Will be updated at a later date	HCV/FUP/VASH/PBV Admin Expenses
Mainstream Voucher Program Housing Assistance Payments (HAP)	Will be updated at a later date	HAP Expenses
Mainstream Voucher Admin Fees	Will be updated at a later date	Administrative Expenses
Family Self Sufficiency	Will be updated at a later date	Family Self Sufficiency program
Other (Fraud Recovery)	Will be updated at a later date	Voucher Programs and Central Office
Capital Funds & Operating Funds for Turnkey III	Will be updated at a later date	Garden Circle (MI064000100)
Non-federal sources (list below)	Will be updated at a later date	
City of Ann Arbor General Fund	Will be updated at a later date	Voucher Administration, Central Office, Tenant Services, and Development of City-Owned Properties
Ann Arbor Downtown Development Authority	Will be updated at a later date	Development of City-Owned Properties in DDA District
Other Revenue	Will be updated at a later date	Management Fees
Total resources	Will be updated at a later date	

AAHC DRAFT FISCAL YEAR 2023 ANNUAL PLAN

Section B.2 and C.1 New Activities

AAHC was designated as a Moving To Work (MTW) agency in January 2022. MTW is a demonstration program for public housing authorities (PHAs) that provides them the opportunity to design strategies to help residents find employment and become self-sufficient and increase housing choices for low-income families. AAHC now has exemptions from many existing voucher rules and more flexibility with how we use Federal funds. AAHC was selected in MTW Cohort #4 Landlord Incentives. AAHC will use the exemption allowed under MTW to establish strategies to increase and continue landlord participation on the HCV program. The MTW program objectives are to reduce costs, give households incentives to achieve economic self-sufficiency, and to increase housing choice. When administering the program AAHC will serve the same number of low-income families as we would without MTW funding flexibility. We will continue to serve a mixed family size. In addition, we will ensure that 75% of the families we assist have income at or below 50% of area median income. Also, we'll ensure that assisted units meet housing quality standards. Lastly, AAHC will establish a reasonable rent policy that will encourage self-sufficiency of our participating families.

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 AAHC is waiting for HUD instructions on how to dispose of this property as it is not a public housing unit. The property will be retained by the AAHC by transferring ownership to the Ann Arbor Housing Development Corporation, a wholly owned non-profit subsidiary of the AAHC. The existing tenant may continue to live at the property with a tenant protection voucher or move with a tenant-based voucher. If there are any proceeds from the transfer of the property, the proceeds will be used to support the AAHC housing and voucher operations.

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 is working with City, County and Downtown Development Authority staff to provide opportunities for community engagement on the site concepts.

The City of Ann Arbor passed an affordable housing millage for 1 mil for 20 years, which will raise about \$6.5 million annually. It is anticipated that the millage will support the development (new construction and acquisition) 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.5 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

AAHC DRAFT FISCAL YEAR 2023 ANNUAL PLAN

The AAHC has been approved by HUD to redevelop all of its public housing to project-based vouchers under the RAD program. Phase 1, 2, 3, 4, & 5 are completed.

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

Through the RAD conversion program, AAHC demolished and build new housing at 3 RAD 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.

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 with a member who is 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.

- 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 FY24.

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

- a. Addition of PBV Units: 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.
 - b. Statement of need Consistent to PHA Plan: AAHC will project-base up to 20% of the AAHC's budget authority in order 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 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

AAHC DRAFT FISCAL YEAR 2023 ANNUAL PLAN

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

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 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 participates 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.

AAHC DRAFT FISCAL YEAR 2023 ANNUAL PLAN

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 enable 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.

Additional Vouchers

In October 2022, AAHC received 16 new voucher increments from HUD. 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

AAHC DRAFT FISCAL YEAR 2023 ANNUAL PLAN

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

Will be updated later.

Section D.2 Resident Advisory Board

The Resident Advisory Board (RAB) - *TBD*

Members who attended the meeting - *NOT YET UPDATED*

Discussion:

OTHER RESIDENT INPUT: *NOT YET UPDATED*

CHALLENGED ELEMENTS TO PLAN: *TBD*

PHA Name : Ann Arbor Housing Commission

PHA Code : MI064

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2023

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 the 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. 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 and support service 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 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)	Plan to Implement in the Submission Year
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)	Plan to Implement in the Submission Year
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
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)	Plan to Implement in the Submission Year
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)	Plan to Implement in the Submission Year
b. Damage Claims (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Plan to Implement in the Submission Year
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

1.b - Tiered Rent (HCV)

This MTW activity serves the following statutory objectives:

Cost Effectiveness and Self-Sufficiency

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.

Activity:

AAHC will implement a tiered rent schedule to all program participants. Eligible households will be grouped by their retrospective gross income into tiers. Within each tier, the HCV tenant rent contribution will be fixed. If a tenant's income increases within the tier; the household rent contribution will not change. Tiers will be developed in \$5000 increments. Households with the gross income between \$0 and \$4,999 will establish the lowest tier. Each tier will increase by \$5000; for instance, the next tier includes households with gross income between \$5000 and \$9,999. The maximum tier will be Ann Arbor Metropolitan Area AMI for a family size of 12-household members.

Eligible tenants will be assigned to a tier based on their prior year gross annual income. The rent in each tier is set at the lowest point of the tier. Households in the lowest tier will pay a minimum rent of \$50. For all other tiers, the rent is equal to the low point of the tier divided by 12, times 25%, plus \$50. All households within each tier have the same rent. Households renting a unit with gross rent above the payment standard will be an exception. These households are responsible for the rent above the payment standard. Household will not pay higher than the gross rent. Since the income tiers for both new admission and current participants are based on gross income, the initial rent burden may at times exceed 40% of the families adjusted monthly income. Households will be eligible for a hardship based on decreases in income or increased household expenses totaling 10% of monthly or annual income.

Goals:

This activity will simplify the rent calculation process for households, reduce administrative burden for staff, improve accuracy of income and rent calculation, encourage housing stability, and reduce cost derived from third party verification process.

Initiative:

This activity is part of a larger initiative to encourage self-sufficiency, encourages asset growth, and bring housing stability parallel with unassisted household by eliminating the interim recertifications from income increases. AAHC staff will reduce their time spent on the certification process for tiered rent participants through biennial recertifications, alternative income exclusions, determining rent using income tiers, and utilizing local methods for EIV and verification processes.

This MTW activity serves the following statutory objectives:

Cost effectiveness and self-sufficiency

This MTW activity has the following cost implications:

Increased revenue and Increased expenditures

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

The MTW activity applies to all assisted households; new admission and current 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.

This is the agency's first fiscal year. AAHC will implement this activity in the submission year.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Ann Arbor Housing Commission MTW agency

Received 0 hardship requests
Approved 0 hardship requests
Denied 0 hardship requests
There is 0 hardship requests pending

Safe Harbor Waivers.

Safe Harbor Waivers seeking HUD Approval:

None

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

None

What is the status of the Safe Harbor Waiver request?

None

Agency-Specific Waiver(s).

Agency-Specific Waiver(s) for HUD Approval:

The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, Agency-Specific Waivers may be requested.

None

Agency-Specific Waiver(s) for which HUD Approval has been Received:

None

1.w. – Alternative Income Inclusions/Exclusions (HCV)	
This MTW activity serves the following statutory objectives:	
Cost Effectiveness and Self-Sufficiency	
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.	
Activity: As part of the agencies tiered rent policy, income from adult members ages 18-24 (excluding the head of household) will not be included in the household annual income calculations. Elderly and disabled individual households are exempt from this rent and determination policy.	
Goals: This activity will simplify the rent calculation process for households, reduce administrative burden by excluding income of adult dependents, and reduce cost derived from third party verification process.	
Initiative: This activity is part of a larger initiative to encourage self-sufficiency, encourage asset growth, and bring housing stability parallel with unassisted households excluding income of adult dependents. AAHC staff will reduce their time spent on the certification process for tiered rent participants through biennial recertifications, alternative income exclusions, determining rent using income tiers, and utilizing local methods for EIV and verification processes.	
This MTW activity serves the following statutory objectives:	
Cost effectiveness and self-sufficiency	
This MTW activity has the following cost implications:	
Increased revenue and decreased expenditures	
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.	
The MTW activity applies to all assisted households; new admissions and currently 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 is the agency’s first fiscal year. AAHC will implement this activity in the submission year.	
No hardship were requested in the most recent fiscal year.	
In the prior year, under this activity, Ann Arbor Housing Commission MTW agency	
Received 0 hardship requests	
Approved 0 hardship requests	
Denied 0 hardship requests	
There is\are 0 hardship requests pending.	
	Safe Harbor Waivers.
	Safe Harbor Waivers seeking HUD Approval:

	Agency must exempt elderly and disabled individuals from this rent determination policy.
	<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>Yes, the AAHC is requesting a Safe Harbor Waiver to implement MTW Activity 1.w. Alternative Income Inclusions/Exclusions.</p>
	<p>What is the status of the Safe Harbor Waiver request?</p> <p>This Safe Harbor waiver has been submitted to HUD and is pending approval.</p>
	Agency-Specific Waiver(s).
	<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, Agency-Specific Waivers may be requested.</p> <p>None</p>
	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>None</p>

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

This MTW activity serves the following statutory objectives:

Cost Effectiveness and Self-Sufficiency

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.

Activity:

AAHC will implement an alternative reexamination schedule to all program participants. Each household tiered rent will apply for two years. During the two-year period, their rent will not increase, and the household will keep any increases in income, rather than having to put in toward rent. After two years each household will have a biennial income reexamination and be placed in the tier that matches their total annual gross income from the prior year. Eligible households will be grouped by their retrospective gross income into tiers. Within each tier, the HCV tenant rent contribution will be fixed. If a tenant's income increases within the tier; the household rent contribution will not change.

Between biennial reexaminations, there will be no interim reexamination. AAHC will allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more. A household's tiered rent will temporarily change if it is approved for a hardship rent. The biennial recertification schedule will also include only reviewing the EIV at the biennial reexamination. The AAHC will implement a release from that is valid for 30 months.

Goals:

The goals for utilizing biennial reexaminations are to achieve cost effectiveness and encourage self-sufficiency. This activity will simplify the rent calculation process for households, reduce administrative burden by using previously determined income, and reduce cost derived from third party verification process.

Initiative:

This activity is part of a larger initiative to encourage self-sufficiency, encourages asset growth, and bring housing stability parallel with unassisted households by implementing a fixed rent schedule. AAHC staff will reduce their time spent on the certification process for tiered rent participants through biennial recertifications, alternative income exclusions, determining rent using income tiers, and utilizing local methods for EIV and verification processes.

This MTW activity serves the following statutory objectives:

Cost effectiveness
Self-sufficiency

This MTW activity serves the following statutory objectives:

Increased revenue
Decreased expenditures

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

The MTW activity applies to all assisted households; new admissions and assistance 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 is the agency first fiscal year. AAHC will implement this activity in the submission year.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Ann Arbor Housing Commission MTW agency: See Hardship Policy

Received 0 hardship requests

Approved 0 hardship requests

Denied 0 hardship requests

There is\are 0 hardship requests pending.

Safe Harbor Waivers.

Safe Harbor Waivers seeking HUD Approval:

None

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

None

What is the status of the Safe Harbor Waiver request?

None

Agency-Specific Waiver(s).

Agency-Specific Waiver(s) for HUD Approval:

The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, Agency-Specific Waivers may be requested.

None

Agency-Specific Waiver(s) for which HUD Approval has been Received:

None

Impact Analysis:

See Attached

4.a. – Vacancy Loss (HCV)	
This MTW activity serves the following statutory objectives:	
Housing choice	
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>Activity: For eligible participants of the Landlord Incentive Demonstration AAHC will offer vacancy loss payment to participating landlords for assisted units. Landlords will receive an additional payment equal to one-month contract rent for re-leasing a unit to a voucher holder after a previous voucher holder has vacated the unit. The unit must be previously occupied and re-leased by an HCV assisted family. Payments will be made to landlords when the next HAP contract is executed between the owner and the AAHC.</p> <p>Goal: The goal of this activity is the increase the number of participating owners, expanding housing opportunities for participants, and deconcentrating poverty.</p> <p>Initiative: AAHC will implement initiatives that seek to incentivize landlords to participate in the HCV program. This activity, combined with triennial inspections, HAP direct deposits, rapid initial HQS inspections, damage loss payments, and bonus payment are intended to increase and retain landlord participation.</p>	
This MTW activity has the following cost implications:	
Decreased expenditures	
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.	
The MTW activity applies to all assisted households: new admissions and current assisted.	
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 is the agency first fiscal year. AAHC will implement this activity in the submission year.	
No hardship were requested in the most recent fiscal year.	
In the prior year, under this activity, Ann Arbor Housing Commission MTW agency	
Received 0 hardship requests	
Approved hardship requests	
Denied hardship requests	
There is\are hardship requests pending.	
	Safe Harbor Waivers.
	Safe Harbor Waivers seeking HUD Approval:
	None
	Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

	None
	<p>What is the status of the Safe Harbor Waiver request?</p> <p>None</p>
	Agency-Specific Waiver(s).
	<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, Agency-Specific Waivers may be requested.</p> <p>Not requested</p>
	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>Not applicable</p>

4.b. – Damage Claims (HCV)

This MTW activity serves the following statutory objectives:

Housing choice

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.

Activity:

Eligible households and their respective landlords will participate in the Landlord Incentive Demonstration. In addition to AAHC making additional payment to landlords that re-lease a unit to a voucher holder, AAHC will compensate current landlords for damage claims as an incentive for continued participation in the HCV program.

To incentivize a landlord's continued participation in the HCV program, AAHC will provide compensation to landlords when the tenant leaves the unit damaged. Landlords will receive compensation for damage claimed not to exceed the lower of the cost of repairs or two months of contract rent. The household'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. Payments will be made to landlords when the next HAP contract is executed between the owner and the AAHC.

Goal:

The goal of this activity is to increase the number of participating owners, expand housing opportunities for participants, and retain landlords' participation in the HCV program.

Initiative:

AAHC will implement initiatives that seek to incentivize landlords to participate in the HCV program. This activity combined with triennial inspections, HAP direct deposits, rapid initial HQS inspections, and bonus payments are intended to increase and retain landlord participation.

This MTW activity has the following cost implications:

Increased expenditures

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

The MTW activity applies to all assisted households: newly admitted and currently assisted

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 is the agency first fiscal year. AAHC will implement this activity in the submission year.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Ann Arbor Housing Commission MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

	Safe Harbor Waivers.
	Safe Harbor Waivers seeking HUD Approval: None
	Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? None
	What is the status of the Safe Harbor Waiver request? None
	Agency-Specific Waiver(s).
	Agency-Specific Waiver(s) for HUD Approval: <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, Agency-Specific Waivers may be requested.</p> Not requested
	Agency-Specific Waiver(s) for which HUD Approval has been Received: Not applicable

4.c. Other Landlord Incentives (HCV)

This MTW activity serves the following statutory objectives:

Housing choice

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.

Activity:

Eligible households will participate in the Landlord Incentive Demonstration. In addition, to AAHC making additional payment to landlords who re-lease units to participating families and compensating landlords for damage claims as an incentive for continued participation in the HCV program. AAHC will make payment to the landlord for security deposit, application fees, holding fees, rental insurance on behalf of the assisted family, a signing bonus to landlord new to the AAHC, and loyalty bonus for current landlord who increased the number of units under HAP contract.

To incentivize a landlord's continued participation in the HCV program, AAHC will provide a signing/loyalty bonus equal to no more than one month of the contract rent to eligible landlords. Payments for security deposit and rental insurance must not exceed one month's rent, in total. Households may request assistance for application fees and holding fees for no more than five units for each voucher issued.

Goal:

The goal of this activity is to increase the number of participating owners, expand housing opportunities for participants, and retain landlord's participation in the HCV program.

Initiative:

AAHC will implement initiatives to incentivize landlords to participate in the HCV program. AAHC will implement initiatives that seek to incentivize landlords to participate in the HCV program. This activity combined with triennial inspections, HAP direct deposits, rapid initial HQS inspections, damage loss payments, and bonus payment are intended to increase and retain landlord participation.

This MTW activity has the following cost implications:

Increased expenditures

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

The MTW activity applies to all assisted households: newly admitted and currently assisted

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 is the agency first fiscal year. AAHC will implement this activity in the submission year.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Ann Arbor Housing Commission MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

Safe Harbor Waivers.

Safe Harbor Waivers seeking HUD Approval:

None

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

None

What is the status of the Safe Harbor Waiver request?

None

Agency-Specific Waiver(s).

Agency-Specific Waiver(s) for HUD Approval:

The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, Agency-Specific Waivers may be requested.

Not requested

Agency-Specific Waiver(s) for which HUD Approval has been Received:

Not applicable

5.d. - Alternative Inspection Schedule (HCV)

This MTW activity serves the following statutory objectives:

Housing choice

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.

Activity:

Through the combined MTW activities 4.a. Vacancy Loss Payment, 4.b. Damage Loss Payments, and 4.c. Other Landlord incentives AAHC will implement activities that encourage owner participation in the HCV program. AAHC will inspect assisted units of eligible households once every three years for landlords who are participating in the Landlord Incentive Demonstration. Eligible households and participating landlords may request interim (special/compliant) inspection at any time during the term of the HAP contract. AAHC will comply with HQS inspection standards as found at 24 CFR 982.401. AAHC will inspect assisted units at any time for health and safety, as well as accessibility purposes.

Goal:

The goal of this activity is to increase the number of participating owners, expand housing opportunities for participants, and retain landlord's participation in the HCV program.

Initiative:

AAHC will implement initiatives to incentivize landlords to participate in the HCV program. AAHC will implement initiatives that seek to incentivize landlords to participate in the HCV program. This activity combined with HAP direct deposits, rapid initial HQS inspections, damage loss payments, and bonus payment are intended to increase and retain landlord participation.

This MTW activity has the following cost implications:

Decreased expenditures

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

The MTW activity applies to all assisted households: newly admitted and currently assisted.

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 is the agency first fiscal year. AAHC will implement this activity in the submission year.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Ann Arbor Housing Commission MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

	Safe Harbor Waivers.
	Safe Harbor Waivers seeking HUD Approval: None
	Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? None
	What is the status of the Safe Harbor Waiver request? None
	Agency-Specific Waiver(s).
	Agency-Specific Waiver(s) for HUD Approval: The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, Agency-Specific Waivers may be requested. None Requested
	Agency-Specific Waiver(s) for which HUD Approval has been Received: None Requested

F.	Public Housing Operating Subsidy Grant Reporting.
F.1	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.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable

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. As of 6/30/2022	
	Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
	80%-50% Area Median Income	1
	49%-30% Area Median Income	8
	Below 30% Area Median Income	112
	Total Local, Non-Traditional Households	121

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

G.2	Establishing Reasonable Rent Policy.

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

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

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
N/A	0	0	0	0	0	0	0	Not Applicable	N/A	Null	Null	Not Applicable	Not Applicable

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.

Occupied Number of Local, Non-Traditional units by	
Family Size:	Household Size
1 Person	494
2 Person	228
3 Person	234
4 Person	248
5 Person	120
6+ Person	120
Totals	1444

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.	
TBD	

I.	Evaluations.
TBD	

Reexamination Impact Analysis

This analysis must consider the following factors, as applicable:

MTW Activity: Reasonable Rent Policy (3.b.) Alternative Reexamination Schedule (HCV) 3.b. i. Reexaminations must occur at least every three years. ii. 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. iii. Agency must implement an impact analysis. * iv. Agency must include a hardship policy. *
Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution);
AAHC anticipates this activity will reduce administrative cost, save staff time, and streamline processes. The agency per family HAP expenses shall increase which is likely to have a significant impact on the agency's finances.
Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs);
This activity combined with 1.b. Tiered Rent and 1.w. Alternative Income Inclusions/Exclusions will likely reduce the family's contribution and encourage asset-saving. Eligible tenants will be assigned to a tier based on their prior year gross annual income. The rent in each tier is set at the lowest point of the tier. Households in the lowest tier will pay a minimum rent of \$50. For all other tiers, the rent is equal to the low point of the tier divided by 12, times 25%, plus \$50. All households within each tier have the same rent. Households renting a unit with gross rent above the payment standard will be an exception. These households are responsible for the rent above the payment standard. Households will not pay higher than the gross rent.
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 an increase in utilization rate in the HCV program. This activity combined with 1.b. Tiered Rent and 1.w. Alternative Income Inclusions/Exclusions will likely streamline the rent determination process therefore increasing utilization by simplifying income calculations.
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. In addition, this activity encourages self-sufficiency by streamlining procedures and allowing families to save increases in income. Lastly, this activity encourages families to improve credit scores and encourage employment stability that will likely increase 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 at or below 50% of the Area Median Income. AAHC proposes to implement the MTW Activity 1b. Tiered Rent, 1.w. Alternative Income Inclusions/Exclusions, and 3.b Alternative Reexamination Schedule, combined to establish a reasonable rent policy to encourage work and self-sufficiency of participating families.

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 has established a hardship policy. Between biennial reexaminations, there will be no interim reexamination. AAHC will allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more. A household's tiered rent will temporarily change if it is approved for a hardship rent.

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.

HARDSHIP POLICY

MTW Activity 1.a. Tiered Rent Policy and 3.b. Alternative Reexamination Schedule

As a Moving to Work (MTW) agency, the PHA has a written policy for determining when a requirement or provision of an MTW activity constitutes a financial or other hardship for the family. MTW regulations allows for the PHA to use a single hardship policy, as applicable, for multiple MTW waivers according to the Final Operations Notice Part VI: Appendix II, Hardship Policy. This hardship policy is applicable to MTW Activity 1.a. Tiered Rent Policy and 3.b. Alternative Reexamination Schedule for HCV Households.

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.

Exemption Period

If the PHA determines that a financial or other hardship exists, the family will receive exemption from the MTW activity as stated below. The MTW activity will resume after expiration of the exemption period.

1. 210 days for loss of benefits such as, but not limited to, Social Security (SS), SS Disability, SSI, Workman's Compensation, and other income as determined in 24 CFR 5.609(b) and (c) (4)(7)(8).
2. 180 days for temporary reduction of benefits such as, but not limited to, Social Security (SS), SS Disability, SSI, Workman's Compensation, and other income as determined in 24 CFR 5.609(b) and (c) (4)(7)(8).
3. 150 days for loss of income due to death by head, spouse, or co-head
4. 120 days for loss or reduction of employment or earnings for any reason
5. 90 days for increased expenses
6. 60 days for break in employment, new employment, or approval of benefit income
7. 30 days for all other circumstances

If the family is fails to meet the hardship standard, the PHA will resume the MTW activity and collect any retroactive rent, if applicable, through a reasonable repayment agreement.

Hardship Standard

The PHA will determine what constitutes financial hardship. A family may request a hardship for the following circumstances. The family must experience a decrease in income because of changed circumstances:

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. The family has experienced an increase of 10% or more of the monthly gross income in expenses: medical costs, childcare, transportation, education, or housing cost.
6. Such other situations and factors as determined by the agency to be appropriate, such as eviction, termination of utilities, or wage garnishment.

Grievance Procedure

A family may request for second level review of denied hardship requests. The family must submit a request must be in writing within 30 days the of the PHA written notice. 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
8. Failure to provide supporting documentation related to loss of income due to death by head, spouse, or co-head