

**AAHC FISCAL YEAR 2024 DRAFT ANNUAL and MTW Supplement Plan  
Public Meeting Notes**

**Section B.7 Resident Advisory Board**

The Resident Advisory Board (RAB) held on October 18, 2023

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

**DISCUSSION:**

**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.

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**Resident Advisory Board Discussion:** None

**OTHER RESIDENT INPUT:**

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

**Response:** 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?

**Response:** 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.

**Response:** please contact AAHC staff for a more detailed response.

**Section B.7 Public Meeting:**

The Public Meeting held on January 10, 2024

This public meeting focused on the AAHC's Annual Plan and HUD's Moving To Work (MTW) Demonstration Program Supplemental Plan, Hardship Policy, Rent Reform, Agency Specific Waivers, and Safe Harbor.

**ATTENDEES:** Weneshia Brand (AAHC), Sharice Miller (AAHC), Katrisha Kelly (AAHC), Misty Hendershot (AAHC), Daa Almasser, Jacqueline Lewis, Maureen Kennedy, Bruce Wilcox, Toya Pace (Avalon Housing), Penny Ryder, Ty'esha Gilbert, Nicole Harris, MUYAH GRAHAM, Tammy Weatherspoon, Adonis Sweatt, K, Lewis, Kali Muhammad, and Ally Silas.

**DISCUSSION:**

MTW agencies must work closely with their residents and stakeholders when developing the Agency-Specific Waivers; therefore, similar to submitting Safe Harbor Waivers, when submitting an Agency-Specific Waiver, the MTW agency must not only follow the PHA Plan public process requirements, but it must also have an additional public meeting to specifically discuss the Agency-Specific Waivers.

The Ann Arbor Housing Commission discussed implementing several MTW activities to establish a reasonable rent policy. The following MTW activities were proposed for implement effective no later than January 1, 2025. Minimum Rent at \$130 except for elderly and disabled households. Tenant Payment as a Modified Percentage of Income. We propose to change the total tenant payment (TTP) from 30% of adjusted median income to 15% of adjusted median income. Setting the TTP at 15% is

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below the allowable maximum of 32% as stated in the Operations Notice. We will request a safe harbor to include elderly and disabled households to benefit from this activity.

In addition, we propose to eliminate Utility Reimbursements payment when the utility allowance is greater than the total tenant payment. The agency proposed to eliminate deductions for \$480 dependent, and \$400 elderly, and disabled deductions for households that are not elderly or disabled. We proposed to implement MTW activity Alternative Income Inclusions/Exclusions to exclude wages for household members between the age 18-23. We will request a safe harbor to include elderly and disabled households to benefit from this activity.

Also, we propose to establish a Payment Standard based on the Small Area Fair Market Rent where allowed and establish grouped zip code when applicable. The payment standard will be between 80% and 150% of the SAFMR. AAHC will also establish a Payment Standard between 80% and 120% of the Fair Market Rent for all other areas. Lastly, we propose to establish an Alternative Reexamination Schedule for households on a biennial (every two years) basis. Households are allowed at least one interim adjustment per year at the request of the household if the gross income has decreased 10% or more. AAHC will complete an impact analysis that is required for all MTW activities. We will establish a hardship policy required for all applicable MTW activities.

**Resident Advisory Board Discussion:** None

**OTHER RESIDENT INPUT:**

**Ryder:** asked why 48108 is not included in the SAMFR and why we don't service Belleville?

**Response:**

- 48108 is already at the affordable income level.
- We don't service Belleville due to 6 other agencies already servicing them.
- The higher subsidy at would apply next recert.

**Kennedy:** asked is the deduction applied to each household member?

**Response:**

- A household will receive a deduction for each qualifying household member

**Lewis:** why would they want to eliminate the disability deduction?

**Response:**

- Eliminating deductions streamlines the recertification process
- Reduces administrative burden

**Silas:** how many clients pay the minimum rent or \$0- \$50 as their tenant portion of rent?

**Response:**

- Less than 10% of program participants pay the minimum rent or less.

**Pace:** could AAHC make utility reimbursement payments to the utility provider instead of to the tenant?

**Response:**

- Regulations allows AAHC to make payment to utility provider however the PHA must determine a percentage to pay for each utility type.

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- AAHC has researched these options and determined the administrative burden is beyond our capacity to manage.

**Kennedy:** asked how often are participants required to complete the annual recertification?

**Response:**

- Currently, participants are required to recertify once a year.
- We are proposing to require household to recertify once every two years
- Participants are invited to complete their annual recertifications at least 120 days prior to the annual recertification date.

**Kennedy:** how would that impact a change or if a family wants to move?

**Response:**

- Families are allowed to report reductions in income or changes in household composition.
- You must contact your Occupancy Specialist to receive instructions to relocate.

**Gilbert:** if a participant become employed, does the tenant portion of rent increase?

**Response:**

- In some circumstances, the tenant portion of rent may increase however it is based on the amount of income and other factors. Please contact your Occupancy Specialist for more assistance.

**Lewis:** how do you determine what percentage of a building will receive project-based vouchers.

**Response:**

- It is determined by the need of the community, the availability of funding and vouchers, and a request for proposal process.

**Wilcox:** if the minimum rent is increased to \$130 and the utility reimbursement is eliminated how would this impact those households who are zero income?

**Response:**

- We anticipate those households would be impact having a seek resources to pay rent or utilities.
- We also anticipate that a reduction in tenant rent payment as a modified percentage of income being reduced from 30% to 15% will encourage household to increase their income and pay less of their income towards rent and utilities.
- AAHC has implemented a minimum rent hardship policy for those who are impacted.
- Elderly and disabled households would be exempt from the \$130 minimum rent.

**Ryder:** asked if IRA's considered an asset or income?

**Response:**

- An IRA is considered an asset. When an IRA is withdrawn it may be considered income.

**Ryder:** mentioned that AAHC staff should meet with participants in person to stress the benefits of any program changes.

**Response:**

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- We ensure that we communicate our policies, programs, meetings, and events with participants by multiple means of communication such as public meetings, in person, by phone, email, mail, and social media.

**Section B.7 Public Meeting:**

AAHC Rise Hope Partner Meeting held on January 11, 2024

**ATTENDEES:** Weneshia Brand (AAHC), Sharon Lapidés (WHA), Rhonda Weathers (SOS) Rick Ward (A Brighter Way), Daniel Kelly (SAWC), Aaron Sukanuma (Washtenaw County Sheriff Dept)

This public meeting focused on the AAHC's Annual Plan and HUD's Moving To Work (MTW) Demonstration Program Supplemental Plan, HOTMA, Hardship Policy, Rent Reform, Agency Specific Waivers, and Safe Harbor. The Ann Arbor Housing Commission discussed implementing several MTW activities to establish a reasonable rent policy. The MTW activities were proposed for implement effective no later than January 1, 2025.

**Lapidés:** Inquired if the HOTMA regulations and MTW activities are applied to all housing authorities?

**Response:** the HOTMA regulation changes are applicable to all PHAs with HCV and Public Housing programs. Some HOTMA regulations are optional to PHA's, however each PHA is required to implement the new regulations no later than January 1, 2025. MTW activities are specifically to agencies designated as MTW. All proposed MTW activities are specific to the Ann Arbor Housing Commission.

**CHALLENGED ELEMENTS TO PLAN:** *None*