

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.