

MTW Supplement to the Annual PHA Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

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Purpose. The Moving to Work (MTW) Supplement to the Annual PHA Plan informs HUD, families served by the PHA, and members of the public, about the MTW Waivers and associated activities that the MTW agency seeks to implement in the coming Fiscal Year and updates the status of MTW activities that have been previously approved. It also provides information about Safe Harbor Waivers, Agency-Specific Waivers, compliance with MTW statutory requirements, and evaluations. The MTW Supplement does not replace the PHA Plan. MTW agencies must continue to submit the applicable PHA Plan. MTW agencies that are not required to submit annual PHA Plans under the Housing and Economic Recovery Act of 2008 (HERA) must submit the MTW Supplement annually, in addition to holding public hearings, obtaining board approval, and consulting with Resident Advisory Boards (RABs) and tenant associations, as applicable, on planned MTW activities.

Applicability. Form HUD-50075-MTW is to be completed annually by all MTW agencies brought onto the MTW Demonstration Program pursuant to Section 239 of the Fiscal Year 2016 Appropriations Act, P.L. 114-113 (2016 MTW Expansion Statute) or legacy MTW agencies² that chose to follow the requirements of the MTW Operations Notice.

Definitions. All terms used in this MTW Supplement are consistent with the definitions stated in the MTW Operations Notice, including:

- (1) **Local, Non-Traditional Activities (LNT)** – Those MTW activities that use MTW funding flexibility outside of the Housing Choice Voucher (HCV) and public housing programs established in Sections 8 and 9 of the U.S. Housing Act of 1937.
- (2) **Safe Harbors** – The additional parameters or requirements, beyond those specified in the MTW activity description itself found in the MTW Operations Notice, following each activity description, that the MTW agency must follow in implementing MTW activities.
- (3) **Substantially the Same Requirement** – A statutory MTW requirement that MTW agencies must continue to assist substantially the same total number of eligible low-income families as would have been served absent the MTW demonstration.

A.	PHA Information.
A.1	<p>PHA Name: Yakima Housing Authority PHA Code: WA042 MTW Supplement for PHA Fiscal Year Beginning: 01/01/2025 PHA Program Type: Housing Choice Voucher (HCV) only MTW Cohort Number: 4 MTW Supplement Submission Type: Annual Submission</p>
B.	Narrative.
B.1	<p>MTW Supplement Narrative. The narrative provides the MTW agency with an opportunity to explain to the public, including the families that it serves, its MTW plans for the fiscal year and its short and long-term goals.</p> <p>The MTW agency should provide a description of how it seeks to further the three MTW statutory objectives during the coming Fiscal Year. Those three MTW statutory objectives are: (1) to reduce cost and achieve greater cost effectiveness in federal expenditures; (2) to give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment.</p>

B. Narrative

The Yakima Housing Authority's mission is "building stronger communities through our commitment to safe and affordable housing." We believe that our participation in MTW will help us further our mission. We have a vision where YHA is able to maximize the number of households served through the voucher program and making changes to the voucher program to make it more efficient to operate, more likely to increase the self-sufficiency of its participants, and more likely to attract and retain landlords. YHA has a vision to create locally designed programs which address the challenges we see here in Yakima and Kittitas Counties. Our vision would focus on the three statutory objectives: cost effectiveness, self-sufficiency, and housing choice as well as the required activities related to landlord incentives.

We look forward to implementing changes in the voucher program that will reduce the cost to administer the program, getting rid of or simplifying regulations and processes that are overly complicated and confusing to landlords, participants, and staff. We believe that there is already a wealth of ideas related to cost effectiveness used by current MTW agencies, however we also want to see if there are other changes that would make sense for us, based on our unique geographical, housing market and participant needs and challenges.

Our vision is also that self-sufficiency would increase among our program participants. We want to establish policies and provide resources and services that enable stability and motivate personal growth. We believe that through a combination of policy changes and partnering with other social service agencies we should be able to make changes that will increase self-sufficiency.

Finally, in the area of housing choice and landlord incentives, YHA will explore changes that will increase landlord participation as well as policies that will allow the voucher participants more choice. These ideas will have to be balanced with cost-effectiveness as many landlord incentives or higher payment standards that can provide more housing choice, are more expensive and we remain committed to serving as many households as possible.

C.

MTW Waivers and Associated Activities.

Activity: 1.u. - Standard Deductions (HCV)

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

Description:

YHA proposes replacing the expense deduction with the following standard expense deduction.

In determining adjusted income, for "qualifying" elderly/disabled households (described below), YHA must deduct the following amounts from annual gross income. To the extent the sum exceeds \$2,518 (which is the equivalent of elderly/disabled households' medical/disabled expense deductions (described below) exceeding three percent of gross annual income of record for elderly/disabled households with such expenses, YHA's initial medical / disability expense deduction will automatically be \$2,518, regardless of the amount of the family. If however, the "qualifying" family claims that they have a higher amount of medical/disability expenses, they will be afforded an opportunity through a hardship process to submit all of their medical/disability expenses for YHA's review and calculation. At the conclusion of this process, "qualifying" households will receive that actual and uncovered medical/disability expense above three percent of their gross annual income if it is greater than \$2,518.

(i) Unreimbursed medical expenses of any elderly family or disabled family; and (ii) Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities, to the extent necessary to enable any member of the family (including the member who is a person with disabilities) to be employed. This deduction may not exceed the earned income received by family members who are 18 years of age or older and who are able to work because of such attendant care or auxiliary apparatus.

In terms of the elderly/disabled household allowance independent of whether or not such household also has medical/disability expenses above three percent of the gross annual income, YHA is adopting the \$525 amount as adjusted by applicable inflation (as posted on HUD's website) and will be adjusted upward when the adjusted allowance reaches an increase of at least \$25. In other words, the first time that the \$525 elderly/disabled household allowance gets adjusted upward for inflationary reasons, the allowance will increase to \$550.

Agency goals for MTW Activity:

For medical expenses and disability assistance expenses, YHA's goal with this activity for all parties involved, is a simpler method to calculate tenant rent and to eliminate original and third-party documentation for two out of the three years of triennial reexaminations.

MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	Cost effectiveness
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.	Cost neutral
Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?	Medical expenses and disability assistance expenses apply to qualifying elderly/disabled households.
Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?	Both new admissions and currently assisted households.
Family Types. Does the MTW activity apply to all family types or only to selected family types?	Only to selected family types (described above)
Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV. For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	For HCV activities: This activity applies to all tenant-based units and properties with project-based vouchers.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	Yes
Does the MTW activity require an impact analysis?	Yes

Custom Questions: Custom questions are tailored to each MTW activity.

How much will the single standard deduction be in the Fiscal Year?

Medical and Disability Expense Deduction:

YHA must deduct the following amounts from annual income. To the extent the sum exceeds \$2,518 (which is the equivalent of elderly/disabled households' medical/disabled expense deductions exceeding three percent of gross annual income for elderly/disabled households with such expenses)

To qualify, elderly/disabled households have to have previously provided (or provide in the first year that this medical expense deduction is allowed), documentation of medical appointments, insurance premiums, prescriptions, and other medical bills that are out-of-pocket expenses not covered by their insurance. The \$2,518 for each qualifying elderly/disabled household in medical/disability expenses, will be a standardized dollar amount. In other words, if an elderly/disabled household qualifies for a

medical /disability expense deduction (as described above) they would automatically receive the \$2,518 as the amount of their medical/disability expense deduction, rather than a lesser or greater amount.

YHA will consider providing medical expenses and disability assistance expenses for those households who successfully claim a hardship or grievance under the enclosed hardship policy.

Activity: C.1.j. Alternative Utility Allowance (HCV)

<p>Narrative. 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><i>Description:</i> Yakima Housing Authority may create a utility schedule(s) for all HCV units based upon bedroom size, the unit location and/or the types of utilities paid by participant. The agency may establish a site-based utility allowance in PBV.</p> <p>The agency must review its schedule of utility allowances each year and revise its allowance for a utility category if there has been a change of 10 percent or more of the cost from the prior year. The agency must maintain information supporting its annual review of utility allowances and any revisions made in its utility allowance schedule.</p> <p><i>Agency goals for MTW Activity:</i> The simplified alternative to creating and determining utility allowances will primarily reduce Yakima Housing Authority's contract costs to produce utility allowances both in its tenant-based and project-based voucher programs. Secondly, this activity may reduce the extent and amount of utility reimbursements where applicable.</p>
<p>MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>Cost effectiveness</p>
<p>Cost implications. 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>Decreased expenditures</p>
<p>Different policy by household status/family types/sites? 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>Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p>	<p>New admissions and currently assisted households</p>
<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	<p>The MTW activity applies to all family types</p>
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities: The MTW activity applies to all tenant-based units and properties with project-based vouchers.*</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	<p>No</p>

Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	No
Custom Questions: Custom questions are tailored to each MTW activity.	
<p>Please describe the alternative method of calculating the utility allowances. Please explain how the method of calculating utility allowances is different from the standard method and what objective the MTW agency aims to achieve by using this alternative method.</p>	<p>The agency may establish a site-based utility allowance in its PBV program. PBV units, particularly new construction and substantial rehabilitated units have lower utility costs as a result of modernized windows, heating and cooling systems, well-insulated elements, etc. Owners/Developers of newly constructed and substantially rehabbed PBV units provide YHA with extensive utility expense data and analyses specific to their dwelling units, upon which accurate utility allowances can be developed. Having a site-based PBV utility allowance would allow for a more accurately calculated utility allowances in these specific dwelling units by comparison with tenant-based voucher-assisted dwelling units which do not generally have the above elements. In addition, more accurately calculated PBV site-based utility allowances will allow for contract rents that are commensurate with their value.</p> <p>Yakima Housing Authority may also create a utility schedule(s) for all tenant-based voucher-assisted units, based upon bedroom size, building type only broken down by single family home vs. multifamily unit rather than breaking down utilities into each of the types of multi-family buildings, the unit location and/or the types of utilities (e.g. gas, electric, oil) paid by participants. The simplified alternative to creating and determining utility allowances will primarily reduce Yakima Housing Authority's contract costs to produce utility allowances both in its tenant-based and project-based voucher programs. Secondly, this activity may reduce the extent and amount of utility allowances where applicable.</p> <p>The first method above is different than the standard method because it is PBV site-base specific rather than community wide. The second method above is different than the standard method because it would streamline the process by only breaking down utility allowances by single family home vs. multifamily unit rather than breaking down utilities into each of the types of multi-family buildings,</p> <p>The first method above would reduce the extent and amount of utility reimbursements because energy efficient and site-specific PBV units are expected to have relatively lower utility allowances than community-wide utility allowances. The second method may or may not result in lower utility allowances after all of the multi-family building types are combined, depending on the weighted average of those results. However, in terms of administrative costs to contract and calculate utility allowances the above method should be more streamlined and less administratively burdensome and costly.</p>

Activity: C.1.n. Utility Reimbursements (HCV)

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

Description:

Yakima Housing Authority may eliminate utility reimbursement payments in the HCV program when the utility allowance is greater than the total tenant payment.

Agency goals for MTW Activity:

This activity will help Yakima Housing Authority reduce paperwork requirements and related compliance matters having to do with - # of 10 Day compliance issues due to the fact that YHA follow up that we have to do to get the information from the tenants to to pay the utility reimbursement where we do not get a lot of responses from applicable households. As a result, YHA currently has to spend a lot of administrative hours spent following-up.

MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

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

Decreased expenditures

Different policy by household status/family types/sites? 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 family types

<p>Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p>	<p>New admissions and currently assisted households</p>
<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	<p>The MTW activity applies to all family types</p>
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For PH activities: Does the MTW activity apply to all public housing developments?</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities: The MTW activity applies to all tenant-based units and properties with project-based vouchers *</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	<p>No</p>
<p>Does this MTW activity require a hardship policy?</p>	<p>No</p>
<p>Does the MTW activity require an impact analysis?</p>	<p>No</p>

Activity: 2.a. – Payment Standards –Small Area Fair Market Rents (FMR) (HCV)

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

Description:

This activity will allow YHA to adopt and implement a reasonable policy to establish payment standards based upon applicable Small Area Fair Market Rents (SAFMRs). YHA may use this flexibility to establish payment standards for grouped ZIP code areas between 80% and 150% of the applicable SAFMRs, based on a range of voucher programmatic outcomes, private market unassisted rents, census data, etc., or may establish payment standards for each ZIP code within its jurisdiction. YHA’s “opportunity areas” include: Yakima (West Valley) 98908, Yakima (West Valley) 98903, and Selah 98942. Among the geographic considerations in grouping SAFMRs, YHA may explore the use of school districts.

Agency Goals for the MTW Activity:

YHA’s goal is to utilize a comprehensive approach to expand housing opportunities for HCV participants and to increase landlord participation in the HCV Program. Ultimately, the YHA will provide HCV participants with information about housing opportunity areas and bargains. This will be done through SAFMRs and the provision/access to information to families with neighborhood data and information to exercise their choices about where to live. YHA will increase housing choices for HCV participants to live in areas of opportunity based on Payment Standards between 80% and 150% of the SAFMRs. Through the measures above, YHA plans to increase housing choice and opportunities and deconcentrating poverty for HCV participants in neighborhoods that have access to jobs, good schools, healthcare, a healthy environment, healthy foods, safe neighborhoods, and transportation services.

MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?

Housing choice and self-sufficiency.

Cost implications. 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

Different policy by household status/family types/sites? 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 family types

Household Status. 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
Family Types. Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For PH activities: Does the MTW activity apply to all public housing developments?</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities: The MTW activity applies to all tenant-based units and properties with project-based vouchers *</p>
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	Yes
Does the MTW activity require an impact analysis?	Yes

Custom Questions: Custom questions are tailored to each MTW activity.	
Please explain the payment standards by ZIP code or "grouped" ZIP codes.	<p>Grouped ZIP codes based on a range of voucher programmatic outcomes, private market unassisted rents, census data, etc.,</p> <p>Through this activity, YHA plans to increase housing choice and opportunities and deconcentrating poverty for HCV participants in neighborhoods that have access to jobs, good schools, healthcare, a healthy environment, healthy foods, safe neighborhoods, and transportation services.</p> <p>Among the geographic considerations in grouping SAFMRs, YHA may explore the use of school districts.</p>

Activity: C2.d. Rent Reasonableness – Third-Party Requirement (HCV)

<p>Narrative. 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><i>Description:</i> Yakima Housing Authority will use MTW flexibility to perform rent reasonable determinations on units that it owns, manages, and/or controls. Yakima Housing Authority will make reasonable rent determinations with the support of third-party software that taps into a national database. This process will ensure fair and valid determinations.</p> <p><i>Agency goals for MTW Activity:</i> Decrease the rent reasonable turnaround time to support on-time reporting. This waiver supports Yakima Housing Authority’s larger goal of using MTW flexibility to streamline administrative processes and reduce agency costs.</p>
<p>MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>Cost effectiveness</p>
<p>Cost implications. 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>Decreased expenditures</p>
<p>Different policy by household status/family types/sites? 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>Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p>	<p>New admissions and currently assisted households</p>
<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	<p>The MTW activity applies to all family types</p>
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities: The MTW activity applies to all tenant-based units and properties with project-based vouchers*</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	<p>No</p>
<p>Does this MTW activity require a hardship policy?</p>	<p>Yes</p>
<p>Does the MTW activity require an impact analysis?</p>	<p>Yes</p>

Custom Questions: Custom questions are tailored to each MTW activity.

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

Reasonable rent determinations will be made with the support of a third-party software database (YARDI) that is updated annually based on market conditions. YHA is going through a software provider conversion from Tenmast to YARDI. Currently, YHA uses Tenmast software to determine rent reasonableness for all the other units not owned or substantially controlled by YHA. YHA will be using our new software provider's rent reasonableness system to determine rent reasonableness on YHA's owned, substantially controlled and/or managed dwelling units in the same manner that we will use it for all other dwelling units.

YHA will have a Supervisor conducting quality assurance on rent reasonableness determinations for all units that it owns, manages, and/or controls.

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

The agency will determine rent reasonableness with the support of third-party software. Yakima Housing Authority will consider information for each type of unit, including location, quality, size, type, age of unit, amenities, maintenance, and utilities to be provided by the owner.

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

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

Description:

YHA may implement a triennial reexamination schedule for some elderly and disabled households. If a household meets the following three criteria, it will be enrolled in triennial reexaminations.

- the head of household, co-head, and/or spouse is elderly or disabled,
- the only current income in the household is fixed income (e.g., social security, pension), and
- there are no minors in the household.

If a household is enrolled in triennial reexaminations and no longer meets these criteria, they will return to annual reexaminations.

For these households, the standard rent calculation method will be used, and households will continue to receive the elderly/disabled allowance and be eligible to claim unreimbursed medical/disability expenses, if certified and claimed by the household. Annual household income will be determined as current and as anticipated once every three years. If a household's income increases in between triennial reexaminations, the household's total tenant payment (TTP) will not increase. While TTP will not increase, the household's rent may increase if their unit's gross rent is above their payment standard. At their annual lease anniversary, YHA will not apply the applicable Cost-of-Living Adjustments for fixed-income households. However, as described in Activity: 1.u. - Standard Deductions (HCV), fixed-income households will also be given an opportunity to certify their medical and/or disability expenses and to qualify for the MTW standard expense deduction. If a fixed-income household claims a hardship, they may go through the process outlined in the hardship and grievance policy if applicable, by provide proof of medical/disability expenses above the MTW standard expense deduction.

Households may continue to request interim reexaminations due to a decrease in income, and/or increases in eligible expenses through the hardship policy. Applicable households will be able to file one interim reexaminations for decreases in income and/or increases in eligible expenses. YHA must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10 percent or more. YHA must conduct an interim reexamination of family income when it becomes aware that the family's adjusted income has changed by an amount that it estimates will result in an increase of ten percent or more in annual adjusted income or such other amount established by HUD through notice, except YHA may not consider any increase in the earned income of the family when estimating or calculating whether the family's adjusted income has increased, unless the family has previously received an interim reduction at their request because of any changes in income since the last examination during the certification period; and YHA may choose not to conduct an interim

reexamination in the last three months of a certification period. In other words, YHAs may not consider a family's increases in earned income for the purposes of an interim reexamination unless the family had previously undergone an interim reexamination during the year for any decrease in income. If the family has undergone an interim reexamination for a decrease in income after the completion of the last reexamination, YHA also has discretion regarding whether or not to count increases in earned income when estimating or calculating whether the family's adjusted income has increased. In determining the income for any family, YHA may make other adjustments as it considers appropriate to reflect current income, taking into consideration any redetermination of income during such prior year(s).

Increases in the family's annual adjusted income – The agency must conduct an interim reexamination of family income when the agency becomes aware that the family's adjusted income (as defined in § 5.611) has changed by an amount that the agency estimates will result in an increase of ten percent or more in annual adjusted income or such other amount established by HUD through notice, except:

(i) The agency may not consider any increase in the *earned* income of the family when estimating or calculating whether the family's adjusted income has increased, unless the family has previously received an interim reduction under paragraph (c)(1) of this section during the certification period; and

(ii) The agency may choose not to conduct an interim reexamination in the last three months of a certification period.

YHA will provide education and materials to participants to inform them that in instances when an elderly/disabled household's fixed income increases, such families will be required to report those increases (e.g. SSI to SSDI with an increased amount) and if the family's adjusted income (as defined in § 5.611) has changed by an amount that the agency estimates will result in an increase of ten percent or more in annual adjusted income or such other amount established by HUD through notice (with the exceptions noted above) the agency must conduct an interim reexamination of family income.

The above policy/treatment of income including increases in earned income and whether or not a PHA can or cannot conduct an interim recertification for this reason, comes directly from HUD's final rule implementing HOTMA.

If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship. An impact analysis and full hardship policy are included with this Supplement.

In determining the income for any family, YHA may make other adjustments as it considers appropriate to reflect current income, taking into consideration any redetermination of income during such prior year(s).

Triennial reexaminations for these households are expected to

	<p>begin with reexaminations effective in 2024. When triennial reexaminations begin for these current households, all newly admitted households who meet the above criteria will also be enrolled in triennial reexaminations. YHA's implementation of triennial reexaminations will take effect in 2024 for all applicable households rather than being phased in. The administrative efficiencies which will result from this activity, particularly over two of the three years covered, will outweigh the administrative time and costs from YHA processing full reexaminations every three years.</p> <p>This schedule will also include only reviewing the EIV at the triennial recertification rather than annually, implementing a release form that is valid during the term of the program participation and updating the payment standard and utility allowance at the time of a rent increase for the affected households. In addition, households on a triennial recertification schedule will not utilize the IVT Report as this reporting requirement is not consistent with the triennial reporting of income and will create an administrative burden that does not assist in the establishment of the level of subsidy the family receives and will increase administrative burden of PHA staff. Unreported income requires no change or rent correction for triennial households unless it occurs before their last reexamination, so the IVT Report will not provide any needed information that cannot be gathered from the EIV. PHA staff will continue to monitor the EIV at households' triennial reexaminations to ensure the proper reporting of income.</p> <p><i>Agency goals for MTW Activity:</i></p> <p>This activity will help YHA further its goals to increase cost effectiveness. This activity will reduce administrative costs and burdens by reducing the amount of recertification paperwork and staff time spent on the certification process for participants through triennial recertifications. This activity may also help reduce some fixed-income households' income to housing cost burdens.</p>
<p>MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>Cost effectiveness</p>
<p>Cost implications. 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 HAP expenditures</p> <p>Decreased administrative expenditures</p> <p>Neutral because that was this the single best choice. HUD's system only allows for one answer.</p>
<p>Different policy by household status/family types/sites? 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 only to a subset or subsets of assisted households</p>
<p>Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p>	<p>New admissions and currently assisted households</p>

<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	<p>The MTW activity applies to families where:</p> <ul style="list-style-type: none"> • the head of household, co-head, and/or spouse is elderly or disabled, • the only current income in the household is fixed income (e.g., social security, pension), and • there are no minors in the household.
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities:</p> <p>The MTW activity applies to all tenant-based units and properties with project-based vouchers</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	<p>No</p>
<p>Does this MTW activity require a hardship policy?</p>	<p>Yes</p>
<p>Does the MTW activity require an impact analysis?</p>	<p>Yes</p>

<p>Custom Questions: Custom questions are tailored to each MTW activity.</p>	
<p>What is the recertification schedule?</p>	<p>Once every three years</p>
<p>How many interim recertifications per year may a household request?</p>	<p>1</p>
<p>Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.</p>	<p>Family circumstances may change throughout the period between triennial reexaminations and between applicable households' annual lease anniversaries. HUD and YHA policies dictate what kinds of information about changes in family circumstances must be reported, and under what circumstances the YHA must process interim reexaminations to reflect those changes. HUD regulations also permit the YHA to conduct interim reexaminations of income or family composition at any time. When an interim reexamination is conducted, only those factors that have changed are verified and adjusted [HCV GB, p. 12-10]. In addition to specifying what information the family must report, HUD regulations permit the family to request an interim determination if other aspects of the family's income or composition changes. The YHA must complete the interim reexamination within a reasonable time after the family's request. In determining the income for any family, YHA may make other adjustments as it considers appropriate to reflect current income, taking into consideration any redetermination of income during such prior year(s).</p>

	<p>At their annual lease anniversary, YHA will not apply the applicable Cost-of-Living Adjustments for fixed-income households based on the source of fixed-income, where fixed income households will also be given an opportunity to certify their medical and/or disability expenses and provide proof of changes in those amounts if applicable.</p> <p>If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship. An impact analysis and full hardship policy are included with this Supplement.</p>
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<p>What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?</p>	<p>N/A</p>
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<p>Activity: 4.c. – Other Landlord Incentives - New Landlord Incentive (HCV)</p>	
<p>Narrative. 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><i>Description:</i></p> <p>YHA is considering the offer a HAP incentive payment of \$1,000 to new landlords, upon the execution of a new HAP contract for an MTW tenant-based HCV participant.</p> <p>New landlords would be incentivized to begin participating in the program. New landlords would be eligible for this payment yearly, based on a new contract with a new tenant. A “new landlord” would be defined as a landlord who has not rented to a tenant-based voucher participant within the past twelve (12) months. The landlord would not be eligible for the \$1,000 incentive HAP payment if the contract is executed for a transfer of units with the same landlord, or if the contract is executed due to a lease renewal or change. Additionally, properties owned or managed by YHA would be ineligible for this incentive. Authority for this incentive is provided by HUD through PIH 2022-18.</p> <p><i>Agency goals for MTW Activity:</i></p> <p>The goal of this activity is to incentivize landlords to continue their participation in the HCV program. The New Landlord Incentive payments are part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity. The New Landlord Incentive will offer compensation when landlords keep units available during the Request for Tenancy Approval and inspection process (a deterrent for some landlords) and also encourage landlords to seek out additional voucher tenants rather than relying on the open market.</p>

MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	Housing choice
Cost implications. 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
Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?	New admissions and currently assisted households
Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?	The MTW activity applies to all family types
Family Types. Does the MTW activity apply to all family types or only to selected family types?	MTW activity applies to all family types
Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV. For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	For HCV activities: This activity will apply to units in YHA's service area. In these zip codes, YHA will offer an increased payment standard due to higher cost rental units, fewer voucher holders living in these areas, and opportunities available to residents in the area. PHA staff review these areas annually.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	No

Custom Questions: Custom questions are tailored to each MTW activity.	
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)?	<input checked="" type="checkbox"/> To all units [No follow-up questions]
Maximum payment to the landlord is \$?	\$1,000
How many payments were issued under this policy in the most recently completed PHA fiscal year? ___ [number of payments]	N/A

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

Activity: 4.c. – Other Landlord Incentives - Existing Landlord Incentive (HCV)

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

Description:

YHA is considering the offer of a one-time \$500 incentive HAP payment to existing landlords who execute a new HAP contract for an MTW tenant-based HCV participant. An “existing landlord” would be defined as a landlord who has rented to a tenant-based voucher participant at any time within the past twelve (12) months. The landlord would not be eligible for the \$500 incentive HAP payment if the contract is executed for a transfer of units with the same landlord, or if the contract is executed due to a lease renewal or change. Additionally, properties owned or managed by YHA would be ineligible for this incentive HAP payment. Authority for this incentive is provided by HUD through PIH 2022-18.

Agency goals for MTW Activity:

The goal of this activity is to incentivize landlords to continue their participation in the HCV program. The Existing Landlord Incentive payments are part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity. The Existing Landlord Incentive will offer compensation when landlords keep units available during the Request for Tenancy Approval and inspection process (a deterrent for some landlords) and also encourage landlords to seek out additional voucher tenants rather than relying on the open market.

MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

Cost implications. 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

Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

New admissions and currently assisted households

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

The MTW activity applies to all family types

Family Types. Does the MTW activity apply to all family types or only to selected family types?

MTW activity applies to all family types

Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions

For HCV activities:
Existing landlords who execute a new HAP contract for an

applicable to PH or HCV. For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	MTW tenant-based HCV participant. An “existing landlord” would be defined as a landlord who has rented to a tenant-based voucher participant at any time within the past twelve (12) months. The landlord would not be eligible if the contract is executed for a transfer of units with the same landlord, or if the contract is executed due to a lease renewal or change. Additionally, properties owned or managed by YHA would be ineligible for this incentive HAP payment.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	No

Custom Questions: Custom questions are tailored to each MTW activity.	
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?	<input checked="" type="checkbox"/> To all units [No follow-up questions]
Maximum payment to the landlord is \$?	The payment amount will be a one-time payment of \$500.
How many payments were issued under this policy in the most recently completed PHA fiscal year? ___ [number of payments]	N/A
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?	N/A

Activity: COHORT 4.1. Waiver of Mandatory Initial Inspection (HCV)

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

Description:

YHA may eliminate the requirement for an initial inspection under certain circumstances.

Agency goals for MTW Activity:

Through this activity, YHA's ability to retain and attract new landlords who want long-term tenants with low turnover would be improved through this activity. YHA would be positioned to overcome the perception that a PHA may be a hassle with which to do business and help deal with landlords' perceived risk of having a voucher client.

The safe harbors under cohort 4.1 are structured in a way that we believe are meaningful but measured. HUD's requirement that one of the three conditions must be met in order to eliminate the initial inspection (listed below), will result in opening up opportunities for a greater number of first-time and existing landlords to consider leasing under YHA's voucher program. In terms of retaining greater percentages of existing landlords participating in our voucher program, the criteria that a unit must have passed an HQS inspection (or equivalent inspection) within the previous three years, will provide the right incentive for them.

i. One of the following must be met to eliminate the initial inspection: a) the unit is less than five years old (as demonstrated by a certificate of occupancy, provided by the landlord); b) the unit passed an HQS inspection (or equivalent inspection) within the previous three years; or c) the unit is located in a census tract with a poverty rate below 10 percent.

ii. The participant must be able to request an interim inspection (agencies may not seek a Safe Harbor Waiver on this safe harbor).

iii. This activity only applies to initial inspections. Units must still have regular inspections according to the agency's schedule.

iv. HQS inspection standards must not be altered as found at 24 CFR 982.401 (agencies may not seek a Safe Harbor Waiver on this safe harbor).

YHA's service area does not have a tremendous number of affordable units that are less than five years old. However, there are a few non-profit developers that have built new units within the last five years that would also benefit from this cohort-specific activity. There are not many census tracts in our service area with poverty rates below 10%, but YHA will certainly educate and market property owners in these areas about the benefits of this option. In terms of HUD's measured approach, voucher

	participants will still be able to request an interim inspection for YHA's inspection and enforcement measures, if applicable.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	Housing Choice and cost effectiveness
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.	Decreased expenditures
Different policy by household status/family types/sites? 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
Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?	Both new admissions and currently assisted households. However, this activity only applies to initial inspections
Family Types. Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types
Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV. For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	For HCV activities: The MTW activity applies to specific properties with project-based vouchers. limited to higher performing landlords/property management companies.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	Yes

Activity: COHORT 4.2. Front-end Vacancy Loss Payment (HCV – Tenant-Based Assistance)

<p>Narrative. 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><i>Description:</i></p> <p>To incentivize a landlord's initial or continued participation in the HCV program, YHA will make additional payments to the landlord in circumstances where the previous tenant was not an HCV participant.</p> <p>This activity will enable YHA to provide an important financial inducement for some first-time landlords' perceived risk of voucher holders / participants and for some existing and previous landlords that had a bad experience of a voucher participant leaving their unit without proper written notice or had their participation in the voucher program terminated by YHA for violation of their family obligations and/or a voucher-assisted household who was evicted through the court system but did not leave on time.</p> <p>To incentivize a landlord's initial or continued participation in the HCV program, YHA would be able to make additional payments to the landlord in circumstances where the previous tenant was not an HCV participant. YHA's payments made to a landlord will be equal or lesser than one month of the contract rent, which will be made to the landlord when the next HAP contract is executed between them and our agency.</p> <p>The agency must update its Administrative Plan to reflect the vacancy loss policy (agencies may not seek a Safe Harbor Waiver on this safe harbor).</p> <p><i>Agency goals for MTW Activity:</i></p> <p>This waiver supports Yakima Housing Authority's larger goal of using MTW flexibility to increase housing choice.</p>
<p>MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>Housing Choice</p>
<p>Cost implications. 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>Different policy by household status/family types/sites? 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>Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p>	<p>Currently assisted households</p>
<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	<p>The MTW activity applies to all family types</p>

<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities: The MTW activity applies to all tenant-based units and units with project-based vouchers *</p>
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	Yes
Custom Questions: Custom questions are tailored to each MTW activity.	
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?	One month of contract rent (upon releasing into YHA's voucher program).
How many payments were issued under this policy in the most recently completed PHA fiscal year?	N/A
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?	N/A

Activity: C.5 Housing Quality Standards; 5.c. Third-Party Requirement (HCV)

<p>Narrative. 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><i>Description:</i> Yakima Housing Authority will perform HQS inspections on project-based voucher-assisted units and dwelling units with tenant-based vouchers that it owns, manages, and/or controls.</p> <p><i>Agency goals for MTW Activity:</i> Streamline the HQS inspection process to match non-PHA owned HQS inspections. This waiver supports Yakima Housing Authority's larger goal of using MTW flexibility to streamline administrative processes and reduce agency costs.</p>
<p>MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>Cost effectiveness</p>
<p>Cost implications. 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>Decreased expenditures</p>
<p>Different policy by household status/family types/sites? 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>Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p>	<p>New admissions and currently assisted households</p>
<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	<p>The MTW activity applies to all family types</p>

Activity: C. 5.d. Alternative Inspection Schedule (HCV)

<p>Narrative. 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><i>Description:</i> Yakima Housing Authority will establish a local inspection schedule for all or a portion of its HCV units at least every three years. YHA will also accept and rely upon other passed-inspections by governmental entities or other entities contracted by governmental entities that meet or exceed HQS / NSPIRE standards for decent, safe and sanitary housing, in lieu of performing its own required inspection within this three-year period. Such examples include but are not limited to passed-inspections under the LIHTC or HOME programs.</p> <p><i>Agency goals for MTW Activity:</i></p> <p>This will help YHA increase property owner participation and create more housing choice for voucher holders, and result in administrative cost savings to YHA.</p> <p>This activity will open opportunities for a greater number of first-time and existing property owners to consider leasing under YHA's voucher program. Having more property owners participate in the voucher program will also lead to greater</p>
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	<p>choice to voucher holders/households. In term of retaining greater percentages of existing property owners participating in our voucher program, will help stabilize tenancies, reduce voucher-assisted households' costs relating to the frequency of their involuntary moves. This outcome will occur as a result of participating property owners being less likely to not renew the lease solely because they would like to be able to communicate, identify and resolve any HQS/NSPIRE items with their voucher-assisted tenant(s) throughout the course of their tenancy without having a third-party / entity to participate in this process as is the case with private-market unassisted tenants. Currently, very few voucher-assisted units go into HAP abatement due to extended non-compliance with HQS/NSPIRE.</p> <p>As an important but third-party, to the greatest extent possible YHA encourages property owners and voucher-assisted households to communicate and to maintain their respective responsibilities to maintain decent, safe, and sanitary housing conditions in compliance with HQS. YHA will provide an enhanced educational component for tenants and property owners to facilitate this activity. Like all other aspects of being a tenant, voucher-assisted households present no greater risk than unassisted tenants and participating property owners who receive a reasonable rent comparable with unassisted dwelling units are expected to maintain their units like unassisted property owners. To this end, after a dwelling unit has passed an initial HQS inspection and it is properly maintained by the property owner and the tenant's use of the property is within normal wear and tear, the need for YHA to conduct annual HQS inspections when both parties can live up to their respective obligations similar to property owners and tenants in the private sector, is something that YHA would like to help foster through this MTW activity. By doing so in a responsible fashion, YHA believes that voucher-assisted households' transition into self-sufficiency for those that go into unassisted rental housing, this practice will help facilitate that transition.</p> <p>With a measured approach, voucher participants will still be able to request an interim inspection for YHA's inspection and enforcement measures, if applicable. YHA will adopt a sound policy regarding the criterion under which qualifying units can be inspected less frequently but at least once every two or three years.</p>
<p>MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>Cost effectiveness, Housing choice and Self-sufficiency</p>
<p>Cost implications. 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>Decreased expenditures</p>
<p>Different policy by household status/family types/sites? 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>Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p>	<p>Both new admissions and currently assisted households</p>
<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	<p>The MTW activity applies to all family types</p>
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities: The MTW activity applies to all tenant-based units and properties with project-based vouchers *</p> <p>This MTW activity apply to all HCV tenant-based units and properties with project-based vouchers.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	<p>No</p>
<p>Does this MTW activity require a hardship policy?</p>	<p>No</p>
<p>Does the MTW activity require an impact analysis?</p>	<p>No</p>

Activity: C 9.a. Increase PBV Program Cap (HCV)

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

Description:
Yakima Housing Authority will increase the number of authorized units that it project-bases.

Agency goals for MTW Activity:
Sometimes, people do not necessarily associate affordable housing at 30% of low-income households' monthly adjusted income in both tenant-based voucher and project-based assistance programs as directly relating to self-sufficiency. However, as noted in our application, relative to our entire portfolio and HAP contracts, YHA is involved with a substantial number of low-income households with housing costs at this affordability threshold. With the right type of wrap around services pertinent to each population type and household, coupled with this activity, YHA believes that significantly greater numbers of households will be able to become self-sufficient and to live independently. Specifically, this activity will enable YHA to provide a greater number of low-income families to pay only 30 percent of their monthly adjusted income towards housing costs rather than higher percentages under tenant-based voucher programs. Over time, low-income PBV-assisted households will be able to both save and invest more of their money into their education, employment, health, transportation, etc. to better enable them to become self-sufficient. This activity will also help YHA to provide family stability in an environment with supportive services applicable to their needs to allow them to live independently and to encourage self-sufficiency.

MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?

Self-Sufficiency

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

Neutral (no cost implications)

Different policy by household status/family types/sites? 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

Household Status. 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

Family Types. Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.

For HCV activities:
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

For HCV activities:
The MTW activity applies to properties with project-based vouchers
*

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	No
Custom Questions: Custom questions are tailored to each MTW activity.	
What percentage of total authorized HCV units will be authorized for project-basing?	Not more than 50%

Activity: C 9.b. Increase PBV Project Cap (HCV)	
<p>Narrative. 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><i>Description:</i></p> <p>Yakima Housing Authority may raise the Project Based Voucher cap within a project up to 100%.</p> <p><i>Agency goals for MTW Activity:</i></p> <p>Create family stability in an environment with support to encourage family self-sufficiency. Specifically, this activity will enable YHA to provide a greater number of low-income families living within a PBV project to pay only 30 percent of their monthly adjusted income towards housing costs rather than higher percentages under tenant-based voucher programs. Over time, low-income PBV-assisted households will be able to both save and invest more of their money into their education, employment, health, transportation, etc. to better enable them to become self-sufficient. This activity will also help YHA to provide family stability in an environment with supportive services applicable to their needs to allow them to live independently and to encourage self-sufficiency.</p>
<p>MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>Self-Sufficiency</p>
<p>Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p>	<p>Neutral (no cost implications)</p>
<p>Different policy by household status/family types/sites? 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>Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p>	<p>New admissions and currently assisted households</p>
<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	<p>The MTW activity applies to all family types</p>
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities: The MTW activity applies to all properties with project-based vouchers</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	<p>No</p>

Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	No

Activity: C 9.c. Elimination of PBV Selection Process for PHA-owned Projects without Improvement, Development, or Replacement (HCV)

<p>Narrative. 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><i>Description:</i> Yakima Housing Authority will eliminate the selection process in the award of PBV to properties owned by the agency that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site.</p> <p><i>Agency goals for MTW Activity:</i> Streamline the selection process for PBV. This waiver supports Yakima Housing Authority's larger goal of using MTW flexibility to streamline administrative processes.</p>
<p>MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>Cost effectiveness</p>
<p>Cost implications. 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>Decreased expenditures</p>
<p>Different policy by household status/family types/sites? 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>Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p>	<p>New admissions and currently assisted households</p>
<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	<p>The MTW activity applies to all family types</p>
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities: The MTW activity applies to all properties with project-based vouchers</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	<p>No</p>
<p>Does this MTW activity require a hardship policy?</p>	<p>No</p>
<p>Does the MTW activity require an impact analysis?</p>	<p>No</p>

Activity: C.9.d. Alternative PBV Selection Process (HCV)

<p>Narrative. 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><i>Description:</i></p> <p>The agency may establish an alternative competitive process in the award of PBVs that are owned by non-profit, for-profit housing entities, or by the agency that are not public housing.</p> <p>If the selected project is PHA-owned, HQS inspections must be performed by an independent entity according to 24 CFR 983.59(b) or 24 CFR 983.103(f).</p> <p>The agency is also subject to Notice PIH 2013-27 where applicable, or successor.</p> <p><i>Agency goals for MTW Activity:</i></p> <p>YHA's goal for this request is to increase cost effectiveness by eliminating this process and increase housing choice.</p>
<p>MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>Cost effectiveness</p>
<p>Cost implications. 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>Decreased expenditures</p>
<p>Different policy by household status/family types/sites? 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>Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p>	<p>New admissions and currently assisted households</p>
<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	<p>The MTW activity applies to all family types</p>
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities: The MTW activity applies to all properties with project-based vouchers</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	<p>No</p>
<p>Does this MTW activity require a hardship policy?</p>	<p>No</p>
<p>Does the MTW activity require an impact analysis?</p>	<p>No</p>

Activity: C 9.f. Increase PBV HAP Contract Length (HCV)

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

Description:

Yakima Housing Authority may lengthen the PBV HAP contract length up to 40 years.

Agency goals for MTW Activity:

This waiver supports Yakima Housing Authority's larger goal of using MTW flexibility to both streamline administrative processes in the PBV HAP contract length terms that can be offered for cost effectiveness and to provide greater affordability in voucher-assisted households' income to housing cost burdens which directly impacts their long-term self-sufficiency. Specifically, this activity will provide a long-term HAP contract incentive to owners/developers to enable YHA to provide low-income families to pay only 30 percent of their monthly adjusted income towards housing costs rather than higher percentages under tenant-based voucher programs. Over time, low-income PBV-assisted households will be able to both save and invest more of their money into their education, employment, health, transportation, etc. to better enable them to become self-sufficient. This activity will also help YHA to provide family stability in an environment with supportive services applicable to their needs to allow them to live independently and to encourage self-sufficiency.

MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?

Self-Sufficiency and cost effectiveness

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

Decreased expenditures

Different policy by household status/family types/sites? 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

Household Status. 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

Family Types. Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.

For HCV activities:

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

For HCV activities:

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

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	No

Activity: 10.c. Alternative Family Selection Procedures (HCV)

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

Description:

YHA proposes making participation in the Family Self-Sufficiency Program With MTW Flexibility, mandatory for any non-elderly or non-disabled households with zero income. These persons will be given a preference ahead of elderly and disabled households on the FSS waiting list as the goal of the Family Self-Sufficiency Program With MTW Flexibility, to get those households the tools they need to become self-sufficient. Tenants will be placed on the Family Self-Sufficiency Program With MTW Flexibility waiting list until a slot becomes available.

YHA proposes a mandatory self-sufficiency program to be phased in with all non-exempt households required to participate over a two-year period. The mandatory self-sufficiency requirement is driven by the following principles:

Mandatory Participation – Participation in a self-sufficiency program is a condition of eligibility for new admissions and a condition of continued occupancy for existing resident households and participant households who are non-elderly and/or non-disabled with zero income. Non-participation would result in denial of admission and termination of housing assistance to participants, following consultation with the family about the supportive services / information and referral offered under the Family Self-Sufficiency Program With MTW Flexibility.

Adult Requirements - All non-elderly and non-disabled households with zero income, are required to actively pursue activities to achieve economic self-sufficiency with a goal of employment for a minimum of 32 hours per week or the annual earned income for the year of participation.

Description - Participation in a self-sufficiency program for non-elderly and non-disabled households with zero income, is a condition of eligibility for new admissions and a condition of continued occupancy for existing resident households and participant households. All non-elderly and non-disabled households with zero income, would be required to actively pursue activities to achieve economic self-sufficiency. The head of the household is required to develop a self-sufficiency plan that identifies goals and objectives for each household member required to participate in the mandatory program and is held accountable for progress of all household members.

New Admissions - New admissions households including households porting from another jurisdiction will be provided one year from the date of the initial lease up in Yakima County to become compliant with requirements. If a new admission household is not compliant with requirements prior to submission of a Request for Tenancy Approval (RFTA), they must meet with a case worker and develop a plan. YHA will not approve a RFTA until the household has developed a plan and executed the Contract. If a member of a household claims self-employment and is establishing a new business, they must provide documentation required by local, state or federal law of the creation and/or existence of the business.

Case Coordination – To assist in the client’s successful completion of their Contract of Participation, coordinators will assist the family in the development of an individual training and services plan and assure that program participants are linked to supportive services they need to achieve their economic self-sufficiency goals.

YHA reviewed HUD’s MTW FSS Guidance.

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

The agency, if implementing an FSS program, even with MTW modifications, must have an up to date, approved FSS Action Plan in accordance with 24 C.F.R. 984.201 that incorporates all modifications to the FSS program approved under the MTW Contract.

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

A hardship policy will be developed and adopted in accordance with MTW guidance prior to the implementation of the activity.

The agency will not make MTW FSS Program participation mandatory for individuals that do not meet the definition of an eligible family at section 23(n)(3) of the 1937 Act, and those exempted from the Community Service Requirement under section 12(c)(2)(A), (B), (D) and (E) of the 1937 Act. If an agency terminates the housing subsidy or tenancy of a family for alleged violation of mandatory MTW FSS Program participation, the family will be entitled to a hearing under the agency’s Grievance Procedure (24 C.F.R. part 966, subpart B) or the HCV informal hearing process (24 C.F.R. part 982.555).

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

Agency goals for MTW Activity:

The goal of YHA proposing to make participation in the Family Self-Sufficiency Program With MTW Flexibility, mandatory for any non-elderly or non-disabled households with zero income, is to get those individuals the tools they need to become self-sufficient.

MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?

Self-sufficiency

<p>Cost implications. 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>Cost neutral</p>
<p>Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p>	<p>Any household member that is non-elderly or non-disabled</p>
<p>Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p>	<p>Both new admissions and currently assisted households</p>
<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	<p>Any household member that is non-elderly or non-disabled</p>
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities:</p> <p>This activity applies to all tenant-based units and properties with project-based vouchers.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	<p>No</p> <p>YHA must review FSS Guidance.</p> <p>YHA must execute a Contract of Participation, or other locally developed agreement, that is at least five years but not more than ten years, with each participant participating in their FSS program.</p> <p>YHA, if implementing an FSS program, even with MTW modifications, must have an up to date, approved FSS Action Plan in accordance with 24 CFR 984.201 that incorporates all modifications to the FSS program approved under the MTW Contract.</p>
<p>Does this MTW activity require a hardship policy?</p>	<p>Yes.</p> <p>A hardship policy will be developed and adopted in accordance with MTW guidance prior to implementation. Participation in the family-self sufficiency program is not mandatory for individuals that do not meet the definition of an eligible family at section 23(n)(3) of the U.S. Housing Act of 1937 (1937 Act) and those exempted from the Community Service Requirement under section 12(c)(2)(A), (B), (D) and (E) of the 1937 Act.</p> <p>If housing subsidy or tenancy is terminated for alleged violation of mandatory Self- Sufficiency Program participation, the family will be entitled to a hearing under YHA's HCV appeals hearing process.</p> <p>Income increases during a family's participation in the MTW Self-Sufficiency Program will not change a family's eligibility status for purposes of participation in the Family Self-Sufficiency Program With MTW Flexibility or for the</p>

	receipt of HCV assistance.
Does the MTW activity require an impact analysis?	Yes

Custom Questions: Custom questions are tailored to each MTW activity.	
Please describe the purpose and goals of the alternative contract or locally developed agreement, and/or the MTW agency's motivation for developing its own contract or agreement.	The goal of YHA proposing to make participation in the Family Self-Sufficiency Program With MTW Flexibility, mandatory for any non-elderly or non-disabled individuals with zero income, is to get those individuals the tools they need to become self-sufficient.

Activity: 10.d. Modify or Eliminate the Contract of Participation (HCV)

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

Description:

Key modifications to the Contract of Participation (HCV) are as follows:

Mandatory Participation - Participation in its FSS Program with MTW Flexibility will be a mandatory condition of eligibility for new admissions and a condition of continued occupancy for existing resident households and participant households who are non-elderly and/or non-disabled. Non-participation would result in denial of admission and termination of housing assistance to participants, following consultation with the family about the supportive services / information and referral offered under the he Family Self-Sufficiency Program With MTW Flexibility.

YHA proposes making participation in the Family Self-Sufficiency Program With MTW Flexibility, mandatory for any non-elderly or non-disabled households with zero income. These persons will be given a preference ahead of elderly and disabled persons on the FSS waiting list as the goal of the Family Self-Sufficiency Program With MTW Flexibility, to get those households the tools they need to become self-sufficient. Tenants will be placed on the Family Self-Sufficiency Program With MTW Flexibility waiting list until a slot becomes available.

- **Adult Requirements -** All non-elderly and non-disabled households with zero income, are required to actively pursue activities to achieve economic self-sufficiency with a goal of employment for a minimum of 32 hours per week or the annual earned income for the year of participation.

Description - Participation in a self-sufficiency program for non-elderly and non-disabled households with zero income, is a condition of eligibility for new admissions and a condition of continued occupancy for existing residents and participants. All non-elderly and non-disabled households with zero income, would be required to actively pursue activities to achieve economic self-sufficiency. The head of the household is required to develop a self-sufficiency plan that identifies goals and objectives for each household member required to participate in the mandatory program and is held accountable for progress of all household members.

New Admissions - New admissions households including households porting from another jurisdiction will be provided one year from the date of the initial lease up in Yakima County to become compliant with requirements.

If a new admission household is not compliant with requirements prior to submission of a Request for Tenancy Approval (RFTA), they must meet with a case

worker and develop a plan. YHA will not approve a RFTA until the household has developed a plan and executed the Contract.

If a member of a household claims self-employment and is establishing a new business, they must provide documentation required by local, state or federal law of the creation and/or existence of the business.

Case Coordination – To assist in the client’s successful completion of their Contract of Participation, coordinators will assist the family in the development of an individual training and services plan and assure that program participants are linked to supportive services they need to achieve their economic self-sufficiency goals.

The agency is authorized to modify the terms of or eliminate the FSS Contract of Participation (HUD–52650), in lieu of a local form. The agency may modify the terms of the Contract of Participation to align with adjustments made to its MTW FSS Program using MTW flexibility. Further, the agency may discontinue use of the Contract of Participation and instead employ a locally-developed agreement that codifies the terms of participation.

- i. Agency must review FSS Guidance.*
- ii. The agency must execute a Contract of Participation, or other locally developed agreement, that is at least five years but not more than ten years, with each participant participating in their FSS program.
- iii. The agency, if implementing an FSS program, even with MTW modifications, must have an up to date, approved FSS Action Plan in accordance with 24 CFR 984.201 that incorporates all modifications to the FSS program approved under the MTW Contract.*
- iv. The agency must not require MTW FSS Program participation as a condition for housing subsidy for elderly and disabled families.*
- v. If the agency requires MTW FSS Program participation as a condition for housing subsidy, an impact analysis must be developed and adopted in accordance with MTW guidance prior to the implementation of the activity.*
- vi. If the agency requires MTW FSS Program participation as a condition for housing subsidy, a hardship policy must be developed and adopted in accordance with MTW guidance prior to the implementation of the activity.*
- vii. The agency must not make MTW FSS Program participation mandatory for individuals that do not meet the definition of an eligible family at section 23(n)(3) of the 1937 Act, and those exempted from the Community Service Requirement under section 12(c)(2)(A), (B), (D) and (E) of the 1937 Act.*
- viii. If an agency terminates the housing subsidy or tenancy of a family for alleged violation of mandatory MTW FSS Program participation, the family will be entitled to a hearing under the agency’s Grievance Procedure (24 CFR part 966, subpart B) or the HCV

	<p>informal hearing process (24 CFR part 982.555).* ix. The agency must not use income increases during participation in the MTW FSS Program to change a family's eligibility status for purposes of participation in the MTW FSS Program or for the receipt public housing or HCV assistance.*</p> <p><i>Agency goals for MTW Activity:</i> The goal of this activity is to increase participation by non-elderly / non-disabled households in YHA's FSS Program with MTW Flexibility by making it a mandatory condition of eligibility for new admissions and a condition of continued occupancy for existing residents and participants who are non-elderly and/or non-disabled. By providing families with supportive services / information and referral offered under the he Family Self-Sufficiency Program With MTW Flexibility, YHA plans to enhance their ability to improve their education, employment, earnings and self-sufficiency.</p>
<p>MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>Self-sufficiency</p>
<p>Cost implications. 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>Cost neutral</p>
<p>Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p>	<p>All non-elderly and non-disabled households</p>
<p>Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p>	<p>Both new admissions and currently assisted households</p>
<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	<p>All non-elderly and non-disabled households</p>
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities:</p> <p>This activity applies to all tenant-based units and properties with project-based vouchers.</p>

<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	<p>Yes</p> <p>YHA must review FSS Guidance.</p> <p>YHA must not require MTW FSS Program participation as a condition for housing subsidy for elderly and disabled families.</p> <p>YHA must execute a Contract of Participation, or other locally developed agreement, that is at least five years but not more than ten years, with each participant participating in their FSS program.</p> <p>YHA, if implementing an FSS program, even with MTW modifications, must have an up to date, approved FSS Action Plan in accordance with 24 CFR 984.201 that incorporates all modifications to the FSS program approved under the MTW Contract.</p>
<p>Does this MTW activity require a hardship policy?</p>	<p>Yes.</p> <p>A hardship policy will be developed and adopted in accordance with MTW guidance prior to implementation. Participation in the family-self sufficiency program is not mandatory for individuals that do not meet the definition of an eligible family at section 23(n)(3) of the U.S. Housing Act of 1937 (1937 Act) and those exempted from the Community Service Requirement under section 12(c)(2)(A), (B), (D) and (E) of the 1937 Act.</p> <p>If housing subsidy or tenancy is terminated for alleged violation of mandatory Self- Sufficiency Program participation, the family will be entitled to a hearing under YHA's HCV appeals hearing process.</p> <p>Income increases during a family's participation in the MTW Self-Sufficiency Program will not change a family's eligibility status for purposes of participation in the Family Self-Sufficiency Program With MTW Flexibility or for the receipt of HCV assistance.</p>
<p>Does the MTW activity require an impact analysis?</p>	<p>Yes</p>

Activity: 10.e. Policies for Addressing Increases in Family Income (HCV)

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

Description:

YHA proposes tailoring its Family Self-Sufficiency (FSS) program with MTW flexibilities to meet the needs of our community and be efficient for staff to administer. FSS program requirements are the same regardless of funding source, program, or property, with a few minor exceptions for site-based programs. Households participating in FSS whose unit is converted under RAD are subject to policies consistent with the RAD program.

The key elements of the FSS program are as follows:

- The rent calculation is used for all FSS participants.
- The traditional escrow account used in HUD Family Self-Sufficiency (FSS) programs will be replaced with a managed savings account. Any rent paid by a participant household above \$350 (known as the "strike point") will be placed into the managed savings account. The monthly amount placed into a family's managed savings account is limited to the difference between the strike point and the lesser of the family's voucher payment standard or gross rent for PBV-assisted households.
- They will earn escrows with a maximum earning potential of \$10,000 and a minimum of \$500.
- Participants who are engaged in a designated program intended to increase the family's economic independence (such as an employment or training program) will receive a preference on the FSS waiting list. 100 percent of the FSS slots may be filled with participants utilizing this preference.
- YHA will allow the FSS contract to be in the name of any adult member of the household.
- The length of time on the program will be five years, with the opportunity to extend for an additional two years. Eligibility for the two-year extension follows current policy and HUD guidelines.
- Participants graduate and have access to the funds in their managed savings account when they have completed their training plan and fulfilled the obligations identified in their contract.
- Families who leave the program prior to graduation will forfeit any money accrued in their managed savings account.

	<ul style="list-style-type: none"> • YHA will continue to provide FSS services at developments where that is required. YHA must not require MTW FSS Program participation as a condition for housing subsidy for elderly and disabled families. That stated, YHA will have site-based preferences for developments where YHA is required to provide FSS services. At such properties, YHA's FSS Program With MTW Flexibility will be mandatory for any non-elderly or non-disabled individuals with zero income. • When a housing assistance payment for a voucher participant drops to zero, deposition into the family's managed savings account will cease. Families can continue to participate in the program for an additional six months, but no savings will accrue during this time. If the family is still at zero assistance after six months, they will graduate from the program. If the family's income decreases to a level that housing assistance is reinstated during that six-month period, they may begin to earn escrow again, and continue participation in the program if the contract determines they are still eligible. • Staff implementing the FSS program will be funded by a combination of HUD-funded FSS Coordinator money, grant funding, and agency budgeting. FSS Coordinator funds will be used only for FSS Coordinator salaries, as directed by the respective NOFAs (Notice of Funding Availability). <p><i>Agency goals for MTW Activity:</i></p> <p>YHA proposes use of a strike point escrow system and modifications to the graduation process to give incentives to non-elderly / non-disabled families where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.</p>
<p>MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>Self-sufficiency</p>
<p>Cost implications. 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>Decreased expenditures</p>
<p>Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p>	<p>All non-elderly and non-disabled households</p>
<p>Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p>	<p>Both new admissions and currently assisted households</p>

<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	<p>All non-elderly and non-disabled households</p>
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities:</p> <p>This activity applies to all tenant-based units and properties with project-based vouchers.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	<p>No</p> <p>YHA must review FSS Guidance.</p> <p>YHA must not require MTW FSS Program participation as a condition for housing subsidy for elderly and disabled families.</p> <p>YHA must execute a Contract of Participation, or other locally developed agreement, that is at least five years but not more than ten years, with each participant participating in their FSS program.</p> <p>YHA, if implementing an FSS program, even with MTW modifications, must have an up to date, approved FSS Action Plan in accordance with 24 CFR 984.201 that incorporates all modifications to the FSS program approved under the MTW Contract.</p>
<p>Does this MTW activity require a hardship policy?</p>	<p>Yes.</p> <p>A hardship policy will be developed and adopted in accordance with MTW guidance prior to implementation. Participation in the family-self sufficiency program is not mandatory for individuals that do not meet the definition of an eligible family at section 23(n)(3) of the U.S. Housing Act of 1937 (1937 Act) and those exempted from the Community Service Requirement under section 12(c)(2)(A), (B), (D) and (E) of the 1937 Act.</p> <p>If housing subsidy or tenancy is terminated for alleged violation of mandatory Self- Sufficiency Program participation, the family will be entitled to a hearing under YHA's HCV appeals hearing process.</p> <p>Income increases during a family's participation in the MTW Self-Sufficiency Program will not change a family's eligibility status for purposes of participation in the Family Self-Sufficiency Program With MTW Flexibility or for the receipt of HCV assistance.</p>
<p>Does the MTW activity require an impact analysis?</p>	<p>Yes</p>

Custom Questions: Custom questions are tailored to each MTW activity.

How will the MTW agency treat increased earnings for families participating in the FSS Program with MTW flexibility?

Instead of the escrow contribution calculation used in standard FSS programs, under this FSS program with MTW flexibilities, each participating household's escrow account would receive an amount equivalent to any rent paid over \$350 (the "strike point") each month. In addition to being more cost-effective than the traditional escrow (because no escrow is paid before the household passes the strike point) and thus potentially more scalable, this incentive avoids the "fairness" problem of providing a larger escrow-building opportunity to households that begin FSS with little or no earnings and thus have the biggest potential to increase their earnings. The strike point model would also be simpler for YHA staff to administer than the traditional model. As part of its efforts to increase self-sufficiency, YHA also proposes making participation in the FSS program mandatory for non-elderly and non-disabled households.

They will earn escrows with a maximum earning potential of \$10,000 and a minimum of \$500.

17. Housing Development Programs

For each LNT housing development that the MTW agency will commit funds to or spend funds on in this Fiscal Year, in Table 17.c.1 below please add the name of the development to one column heading and then provide the requested information, including the MTW agency role (Acquisition, Rehabilitation, or New Construction), the type of MTW agency financing (Gap Financing, Tax Credit Partnership, Other), and the total number of affordable units in the development. If possible, please provide a breakdown of the number of affordable units by level of affordability.

Activity: C. 17.c. Local, Non-Traditional Activities - Housing Development Programs

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

Description:

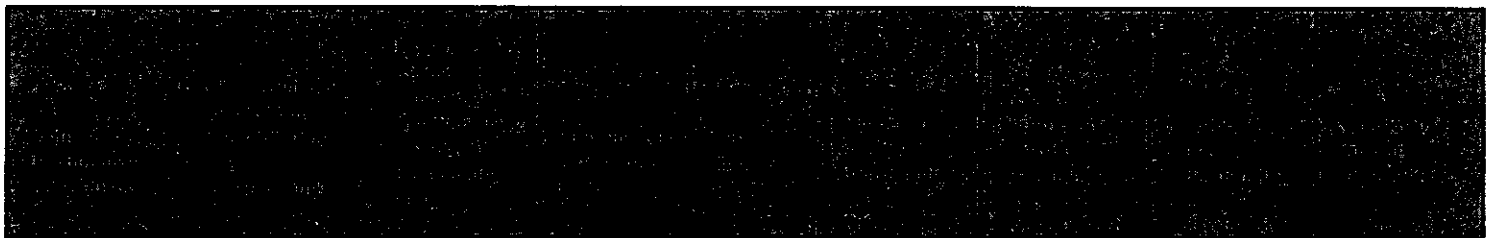
YHA may utilize this activity to provide gap financing to affordable housing developments including, but not limited to RAD-PBV developments, PBV developments Low Income Housing Tax Credit developments and/or other eligible development activities, subject to approval by the YHA's Board of Commissioners. YHA may also use MTW funds for gap financing and to support its other owned or substantially controlled developments. YHA may expend MTW funds including Housing Assistance Payments and/or HCV Administrative Fee reserves on such activities if it shall not expend more than 10% of its Housing Assistance Payments budget on local, non-traditional activities including this housing development activity.

In implementing this activity, YHA shall: 1) ensure that families assisted meet the HUD definition of "low-income"; 2) comply with PIH Notice 2011-45 as applicable; 3) comply with Section 30 of the US Housing Act of 1937; and 4) Competitively bid any MTW funding awarded through this activity to a third-party provider.

Agency goals for MTW Activity:

Yakima Valley Preservation – Scattered Site	Rehabilitation	Gap financing	149	149	24	60	65	
Fair Avenue Apartments 110 South Fair Avenue	Rehabilitation	Gap financing	150	150		45	60	45 (40% AMI)
Pacific Apartments 50/508 Pacific Avenue								
Evergreen Apartments 1322 South 18th Avenue								
Cascade Apartments 615 North 15th Avenue								
Eastwood Apartments 610 East Arlington Street								
Spruce Lane Apartments 914 East Spruce Street								
Edgewood Apartments 621 North 16th Avenue								
Willow Lane Apartments 1214 Willow Street								
Sierra Apartments 603 Central Avenue								
Parkview Apartments 801 Central Avenue								
9th Street Apartments 1212 South 9th Street								
Yakima Terrace 1307/1309/1311 A&B South 18th Avenue								
Nueva Primavera 810 North 6th Avenue								

Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year



Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year



D.1 Safe Harbor Waivers seeking HUD Approval:

The MTW Operations Notice describes a simplified process for MTW agencies to implement MTW activities outside of the safe harbors described in Appendix I. For each Safe Harbor Waiver request, a document that includes the following information must be provided: (a) the name and number of the MTW Waiver and associated activity for which the MTW agency is seeking to expand the safe harbor, (b) the specific safe harbor and its implementing regulation, (c) the proposed MTW activity the MTW agency wishes to implement via this Safe Harbor Waiver, (d) a description of the local issue and why such an expansion is needed to implement the MTW activity, (e) an impact analysis, (f) a description of the hardship policy for the MTW activity, if applicable, and (g) 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.

Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?

Yes [If yes, upload required information in a-g above for each Safe Harbor Waiver request]

E.1 Agency-Specific Waivers 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, 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.

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.

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

Custom Questions: Custom questions are tailored to each MTW activity.

Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?

No [If no, skip to E.2]

E.2 Agency-Specific Waiver(s) for which HUD Approval has been Received:

For each previously approved Agency-Specific Waiver(s), a set of questions will populate.

Does the MTW agency have any approved Agency-Specific Waivers?

No [If no, question set concludes]

F.1 Please provide the public housing Operating Subsidy grant information in the table below for Operating Subsidy grants appropriated in each Federal Fiscal Year the PHA is designated an MTW PHA.

N/A	N/A	N/A	N/A	N/A

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.

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.

Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?

No [If Yes]: please describe the MTW agency's plans for its future rent reform activity and the implementation timeline. [Text box]

6.3 Local, Non-Traditional Rental Subsidy and Housing Development

Questions	Input options and instructions
Please provide the total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	0 unit months
Please provide 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 unit months
How many units, developed under the local, non-traditional housing development activity, were available for occupancy during the prior full calendar year (by bedroom size)?	Please include only those units that serve households at or below 80% of AMI in the table provided.

PROPERTY NAME/ADDRESS	0/1	2	3	4	5	6+ BR	TOTAL UNITS	POPULATION TYPE	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/Vision)	FISCAL YEAR	CITY/STATE
	BR	BR	BR	BR	BR	BR						
Name/Address	#	#	#	#	#	#	#	Type (below)	#	#	Y/N	\$
Name/Address	#	#	#	#	#	#	#	Type (below)	#	#	Y/N	\$
Name/Address	#	#	#	#	#	#	#	Type (below)	#	#	Y/N	\$
Totals	#	#	#	#	#	#	#		#	#		

* User will select one of the following from the "Population Type" dropdown box: General, Elderly, Disabled, Elderly/Disabled, Other

If the "Population Type" of is Other is selected, please state the Property Name/Address and describe the population type. [Text box]

** The federal accessibility standard under HUD's Section 504 regulation is the Uniform Federal Accessibility Standards (UFAS) for purposes of Section 504 compliance. HUD recipients may alternatively use the 2010 ADA Standards for Accessible Design under Title II of the ADA, except for certain specific identified provisions, as detailed in HUD's Notice on "Instructions for use of alternative accessibility standard," published in the Federal Register on May 23, 2014 ("Deeming Notice") for purposes of Section 504 compliance, <https://www.govinfo.gov/content/pkg/FR-2014-05-23/pdf/2014-11844.pdf>. This would also include adaptable units as defined by HUD's Section 504 regulation (See 24 CFR § 8.3 and § 8.22).

6.4 Comparable Mix (by Family Size) - Local, Non-Traditional

In order to demonstrate that the MTW statutory requirement of "maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration" is being achieved, the MTW agency will provide information for its most recently completed Fiscal Year in the following table.

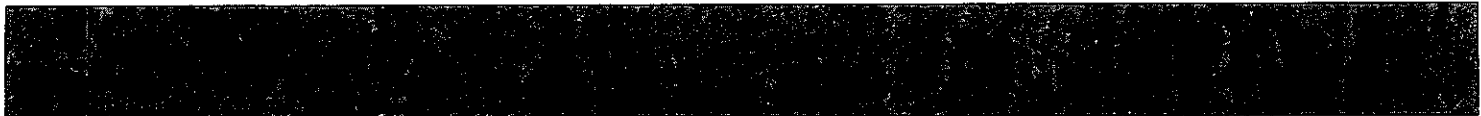
Local, non-traditional family size data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

Family Size	Overall Number of Local, Non-Traditional Units by Household Size
1 Person	0

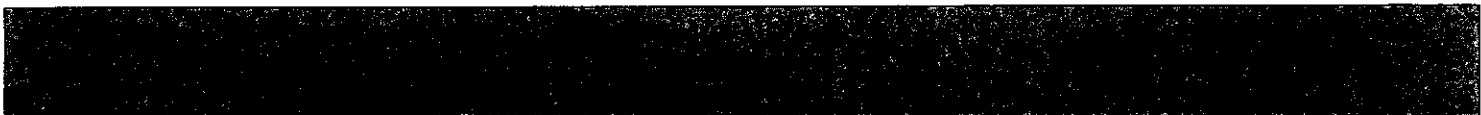
2 Person	0
3 Person	0
4 Person	0
5 Person	0
6+ Person	0
Totals	0



Certification is included in MTW Certifications of Compliance for HCV and local, non-traditional program. The public housing program is monitored through physical inspections performed by the Real Estate Assessment Center (REAC).



Please provide copy of all comments received by the public, Resident Advisory Board, and tenant associations.	Upload Attachment
Please attach a narrative describing the MTW agency's analysis of the comments and any decisions made based on these comments.	Upload Attachment
If applicable, was an additional public hearing held for an Agency-Specific Waiver and/or Safe Harbor waiver?	No
If yes, please attach the comments received along with the MTW agency's description of how comments were considered.	Upload Attachment



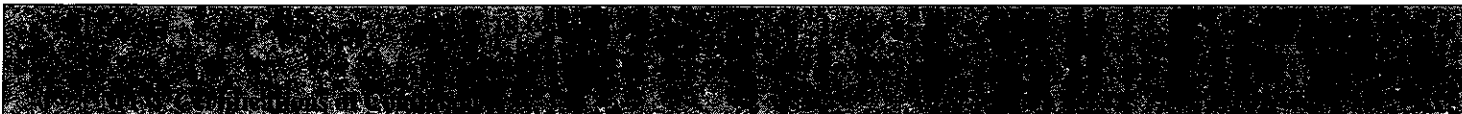
I.1	Please list any ongoing and completed evaluations of the MTW agency's MTW policies, that the PHA is aware of, including the information requested in the table below. In the box "title and short description," please write the title of the evaluation and a brief description of the focus of the evaluation.
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Does the PHA have an agency-sponsored evaluation?	No
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Table I.1 - Evaluations of MTW Policies





J.1	The MTW agency must execute the MTW Certifications of Compliance form and submit as part of the MTW Supplement submission to HUD. Certification is provided below.
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YHA MTW Hardship Policy

YHA has created a hardship policy for when a requirement or provision of certain MTW activities constitutes a financial or other hardship for an YHA household. YHA will review its hardship policy with clients during the 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 agency will also consider if a client qualifies for a hardship exemption at the time of a potential termination of assistance that is due to an MTW activity. When a client requests a hardship exemption from an MTW activity included in this policy, YHA will suspend the activity for the household beginning the next month after the request until YHA has determined if the request is warranted. Hardship information will be retained by YHA for the duration of YHA's participation in the MTW demonstration program.

Hardship Policy: 1.u. Standard Deductions (HCV)

Households must apply for all hardship types with the exception of automatic hardships given at the time of the triennial recertification. Hardships may last less than the timeframe listed below if a hardship time period overlaps with a triennial recertification. Approval will be for the following reasons only.

Automatic Hardships:

These hardships may be granted at the time of the triennial recertification for the following reasons.

1. A qualifying household's current gross income is at or exceeds an amount that is 10 percent less than their retrospective (prior actual 12-months) income.
2. YHA will provide medical and disability expense deductions to those households who successfully claim a hardship or grievance. Medical and disability expenses total more than the dollar equivalent of 15 percent of a qualifying household's gross annual income used for TTP purposes for each elderly/disabled household that demonstrates and certifies that their medical expenses exceed at least three percent of their gross income and have previously provided (or provide in the first year that this medical expense deduction is allowed), documentation of medical appointments, insurance premiums, prescriptions, and other medical bills that are out-of-pocket expenses not covered by their insurance. In other words, if an elderly/disabled household claims and qualifies for a medical and disability expense deduction and provides any/all of the documentation in the categories below that exceeds 3 percent of a qualifying household's gross annual income, YHA will provide the full amount of their **actual** medical and disability expense deduction as documented minus three percent of their gross annual income. Eligible expenses include:
 - (i) Unreimbursed medical expenses of any elderly family or disabled family; and
 - (ii) Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities, to the extent necessary to enable any member of the family (including the member who is a person with disabilities) to be employed. This deduction may not exceed the earned income received by family members who are 18 years of age or older and who are able to work because of such attendant care or auxiliary apparatus; and

Other Hardships:

- Awaiting approval for benefit income

- Such other situations and factors as determined by the agency to be appropriate, such as eviction, or termination of utilities.

Other circumstances: A household may request a hardship exemption for other circumstances not outlined in this policy, such as the death of a family member that impacts the family's finances. YHA will consider these requests and appropriate remedies on a case-by-case basis and decisions will be made by a staff member at the supervisor level or higher.

Long Term Hardship:

1. Death of a household member.

Requesting A Hardship:

To request a hardship, the participant/resident must complete a Hardship Request form and attach the household's current income and proof of hardship. The form will be made available in an accessible format upon request as a reasonable accommodation. Current proof of all income for all current household members will be required. The request will be reviewed and the household notified of the approval or denial in a timely manner.

YHA will determine whether an approved hardship exists within 30 days after the request is received. Hardship requests may be denied for the following reasons:

- Failure to provide verification for loss or reduction of benefit income
- Failure to provide verification for eligibility of benefit income
- Failure to provide verification of increased expenses
- Family is not subject to eviction, utility shut off, or wage garnishment
- Failure to provide supporting documentation related to loss of income due to death in the family

The hardship request will be denied if the form is not accompanied by documentation of the hardship and/or the request does not meet the above criteria. In the case of hardship denials, the household will be sent a denial letter stating why they did not qualify. Prior to the expiration of the hardship, the household will be notified of their rent portion set at their last triennial recertification or new admission. Households may request a renewal of their hardship. The request will be treated as a new hardship request and undergo a new determination with current income.

If a household is approved for a hardship, and subsequently experiences another adverse event while still in hardship status, they may request an additional hardship. The request will be treated as a new hardship request and undergo a new determination with current income. There is no limit on the number of hardships that a household may receive. If a household is approved for a hardship, they are not required to report subsequent income increases during the period of their approved hardship.

Grievance Procedure:

If a client disagrees with a hardship determination, they will follow YHA's informal hearing process outlined in the Administrative Plan.

A family may request for second level review of denied hardship requests, which will be conducted by a staff member at the supervisor level or higher. The household must request a grievance review within and including ten (10) business days of the decision to deny or limit their hardship request.

If the request does not meet YHA hardship standards outlined above, YHA will resume the MTW activity. If the

request meets the hardship standards outlined above, the agency will continue to provide an exemption from the MTW activity until the next reexamination. If a client requests an additional hardship following the expiration of a previous hardship (or for a hardship renewal), the request will be treated as a new hardship request and undergo a new determination based on current income and information.

Exemption Period:

If YHA 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.

- 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).
- 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).
- 150 days for loss of income due to death by head, spouse, or co-head
- 90 days for increased expenses
- 60 days for break in approval of benefit income
- 30 days for all other circumstances

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

YHA will move to a triennial reexamination schedule for some elderly and disabled households. If a household meets the following three criteria, it will be enrolled in triennial reexaminations.

- the head of household, co-head, and/or spouse is elderly or disabled,
- the only current income in the household is fixed income (e.g., social security, pension), and
- there are no minors in the household.

If a household is enrolled in triennial reexaminations and no longer meets these criteria, they will return to annual reexaminations.

At their annual lease anniversary, YHA will automatically apply the applicable Cost-of-Living Adjustments for fixed-income households based on the source of fixed-income, where fixed income households will also be given an opportunity to certify their medical and/or disability expenses and provide proof of changes in those amounts if applicable.

Households may continue to request interim reexaminations due to a decrease in income and/or increases in eligible expenses. Applicable households will be able to file one interim reexaminations for decreases in income and/or increases in eligible expenses. YHA must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10 percent or more. YHA must conduct an interim reexamination of family income when it becomes aware that the family's adjusted income has changed by an amount that it estimates will result in an increase of ten percent or more in annual adjusted income or such other amount established by HUD through notice, except YHA may not consider any increase in the earned income of the family when estimating or calculating whether the family's adjusted income has increased, unless the family has previously received an interim reduction at their request because of any changes in income since the last examination during the certification period; and YHA may choose not to conduct an interim reexamination in the last three months of a certification period. In other words, YHAs may not consider a family's increases in earned income for the purposes of an interim reexamination unless the family had previously undergone an interim

reexamination during the year for any decrease in income. If the family has undergone an interim reexamination for a decrease in income after the completion of the last reexamination, YHA also has discretion regarding whether or not to count increases in earned income when estimating or calculating whether the family's adjusted income has increased. In determining the income for any family, YHA may make other adjustments as it considers appropriate to reflect current income, taking into consideration any redetermination of income during such prior year(s).

If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship.

Triennial reexaminations for these households are expected to begin with reexaminations effective July 1, 2023. When triennial reexaminations begin for these current households, all newly admitted households who meet the above criteria will also be enrolled in triennial reexaminations.

This schedule will also include only reviewing the EIV at the triennial recertification rather than annually and implementing a release form that is valid for 45 months. In addition, households on a triennial recertification schedule will not utilize the Income Validation Tool (IVT) Report as this reporting requirement is not consistent with the triennial reporting of income and will create an administrative burden that does not assist in the establishment of the level of subsidy the family receives and will increase administrative burden of YHA staff. Unreported income requires no change or rent correction for triennial tiered rent households unless it occurs before their last reexamination, so the IVT Report will not provide any needed information that cannot be gathered from the EIV. YHA staff will continue to monitor the EIV at households' triennial reexaminations to ensure the proper reporting of income.

Hardship Standard

To qualify for a hardship exemption, a family must submit a request for a hardship exemption in writing. The request must explain the nature of the hardship.

Approval will be for the following reasons only:

- A qualifying household's current gross income is at or exceeds an amount that is 10 percent less than their retrospective (prior actual 12-months) income.
- A qualifying household's including medical expenses and/or disability-related expenses exceeds the amount of YHA's expense deduction for such household.
- Awaiting approval for benefit income
- Such other situations and factors as determined by the agency to be appropriate, such as eviction, or termination of utilities.

Grievance Procedure

YHA will determine whether an approved hardship exists within 30 days after the request is received.

If the request does not meet YHA hardship standards outlined above, YHA will resume the MTW activity and collect any retroactive rent, if applicable, through a reasonable repayment agreement.

If the request meets the hardship standards outlined above, the agency will continue to provide an exemption from the MTW activity for 12 months or until the next triennial reexamination.

If a client requests an additional hardship following the expiration of a previous hardship (or for a hardship

renewal), the request will be treated as a new hardship request and undergo a new determination based on current income and information.

If a client disagrees with a hardship determination, they will follow YHA's informal hearing process outlined in the Administrative Plan.

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
6. Failure to provide supporting documentation related to loss of income due to death in the family

Exemption Period

If YHA 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. 90 days for increased expenses
5. 60 days for break in approval of benefit income
6. 30 days for all other circumstances

Activity: 2.a. - Payment Standards – Small Area Fair Market Rents (FMR) (HCV)

In order to qualify for a hardship exemption, households must meet all of the criteria listed below:

1. The household is in compliance with all the program rules and regulations.
2. The household does not owe YHA any money or is current with a re-payment agreement.
3. The household must be admitted to the program prior to July 1, 2023.
4. The household has not relocated on or after July 1, 2023.
5. The household must experience an increase of 5 percent or more in rent as a direct result of the MTW rent reform initiatives.
6. The household must request the hardship waiver within 10 business days from the date of the letter notifying them of change and giving the timeline in which to request an Informal Hearing or hardship review.
7. The household has not received a rent reform hardship relief for the Payment Standards application at interim recertification previously.

Hardship relief for households who qualify and receive waiver approval would pay their portion of rent based on the calculation under HUD regulations prior to YHA's implementation of this MTW activity, until their next reexamination / recertification or relocation. At the next reexamination / recertification, or relocation, whichever comes first, the household will automatically be subject to the payment standards set by YHA at that time.

Each household is only eligible for one term of relief for the payment standards initiative.

Activity: 10.c. Alternative Family Selection Procedures (HCV) & Activity: 10.e. Policies for Addressing Increases in Family Income (HCV)

All households participating in an MTW eligible program may submit a hardship exemption request.

Households may qualify for a hardship exemption if one of the following criteria is met:

1. Households may qualify for a hardship exemption if the total shelter costs exceed 50 percent of the gross monthly income used to determine household's rent and subsidy.

Total shelter costs are defined as rent and utilities paid by the household.

While all households qualify to request a hardship exemption, generally those having the following criteria will not qualify for an exemption:

- a. Amount of subsidy reduction for mixed families
- b. Additional amount a household has chosen to pay above the payment standard for an HCV assisted unit.

Households receiving zero assistance may not qualify to receive a rent reduction even if the circumstances that qualified them for an automatic phase-in continue. However, if the household experiences a change in circumstances that would result in a HAP payment to owner within the 180-day period, the continuing phase-in hardship and rent reduction will be reviewed at that time.

Applying for a Hardship Exemption

All hardship exemption requests must be made in writing and submitted to YHA's office. Requests must be received by the 15th of each month to be eligible for a revised rent effective on the first of the next month. Hardship exemption requests / adjustments will not be retroactive.

Only hardships expected to last longer than 90 calendar days will be considered.

Households applying for a hardship exemption are strongly encouraged to include the following documents / verifications with their request, as applicable:

- For households who have recently lost earned income – proof of application for unemployment;
- For households with children – proof of application for TANF and / or child support;
- Proof of application through WorkSource;
- Proof of application / participation in one of the PHA's self-sufficiency programs;
- Proof of application for low-income energy assistance through an external community agency.

Determination of Hardship Exemptions

A hardship committee with representatives from the YHA staff will review hardship requests on a monthly basis. The committee has the authorization to implement an agreed upon exemption remedy. If the committee cannot reach consensus regarding a hardship request, the majority vote will rule.

The committee will consider each household's circumstances on a case-by-case basis. The committee will have a menu of remedies to reduce a qualifying household's rent burden. These choices may include, but are not limited to, the following:

- Set tenant rent to \$0 for a specific period of time. This option would not include a utility reimbursement to the family.
- Extend a utility reimbursement for a specific period of time.
- Cap total shelter costs to not exceed 50 percent of gross monthly income or other appropriate percentage for a specific period of time.
- Reduce the amount of tenant rent.
- Remove minimum tenant rent for a specific period of time.
- A household's rent amount may result in a credit or utility reimbursement payment however the amount the households receive will never be more than the utility allowance for their unit.
- Any combination of the above remedies.

The hardship exemptions will be granted to eligible households for a minimum of 3 months and a maximum of 12 months. Households may apply for another exemption once their exemption expires.

In cases when the committee recommends denial of a hardship request, the Director or Assistant Director of Rent Assistance or designee will make the final determination. In extraordinary cases, the hardship committee may make a final recommendation to the Director or Assistant Director of Rent Assistance who will have final approval when circumstances call for a deviation from hardship policy.

Notice of Hardship Exemption or Denial of Exemption

In cases when the committee grants a hardship exemption, the PHA will notify the owner and the family of the

effective date, the new HAP payment and tenant rent, and the expiration date of the exemption.

If the hardship exemption is denied, the family will be notified of a decision in writing within 15 business days of the determination.