

# PHA Name : New Hampshire Housing Finance Agency

**PHA Code :** NH901

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

**PHA Program Type:** Housing Choice Voucher (HCV) only

**MTW Cohort Number:** Asset Building

**MTW Supplement Submission Type:** Annual Submission

## **B. MTW Supplement Narrative.**

Utilizing MTW flexibility, NHHFA intends to:

1. Deliver housing programs and services in a more efficient, streamlined manner that is accessible and transparent to clients, and that reduces unnecessary administrative burdens on clients and staff.
2. Expand housing options and choices to serve the unique, diverse needs of New Hampshire's low-income residents, promoting mobility to high opportunity areas and strengthening partnerships to serve individuals and families in need of supportive services; and
3. Support residents in achieving economic self-sufficiency through a new MTW Opt-Out Savings Account Option, enhanced FSS program incentives and other partnership initiatives utilizing housing as a platform to stabilize and strengthen families.

NHHFA is committed to meaningful community engagement in the planning and implementation of asset building and other MTW initiatives. NHHFA has an existing Resident Advisory Board (RAB) whose membership includes HCV participants who currently provide input and recommendations regarding the PHA Plan. NHHFA consulted with the RAB to develop this MTW plan and application and will continue to consult with the group on an ongoing basis to develop future MTW strategies including those proposed in each annual MTW Supplement.

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

<b>1. Tenant Rent Policies</b>	
b. Tiered Rent (HCV)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
f. Minimum Rent (HCV)	Currently Implementing
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Currently Implementing
q. Imputed Income (HCV)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
<b>2. Payment Standards and Rent Reasonableness</b>	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Currently Implementing
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
<b>3. Reexaminations</b>	
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
d. Self-Certification of Assets (HCV)	Currently Implementing
<b>4. Landlord Leasing Incentives</b>	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Not Currently Implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Not Currently Implemented
<b>5. Housing Quality Standards (HQS)</b>	
a. Pre-Qualifying Unit Inspections (HCV)	Currently Implementing
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Currently Implementing
<b>6. Short-Term Assistance</b>	
b. Short-Term Assistance (HCV)	Currently Implementing
<b>7. Term-Limited Assistance</b>	
b. Term-Limited Assistance (HCV)	Not Currently Implemented
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	
Increase Elderly Age (PH & HCV)	Not Currently Implemented
<b>9. Project-Based Voucher Program Flexibilities</b>	
a. Increase PBV Program Cap (HCV)	Currently Implementing
b. Increase PBV Project Cap (HCV)	Currently Implementing
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Currently Implementing
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
a.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program	

Coordinating Committee (HCV)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>11. MTW Self-Sufficiency Program</b>	
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Currently Implementing
<b>12. Work Requirement</b>	
b. Work Requirement (HCV)	Not Currently Implemented
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
<b>14. Moving on Policy</b>	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
<b>17. Local, Non-Traditional Activities</b>	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented
c. Housing Development Programs	Not Currently Implemented

**C. MTW Activities Plan that New Hampshire Housing Finance Agency Plans to Implement in the Submission Year or Is Currently Implementing**

<b>1.f. - Minimum Rent (HCV)</b>
<p><b>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</b></p> <p>NHHFA is currently implementing a minimum tenant rent (total tenant payment) of \$50.00. Elderly and disabled households are exempt from this activity. For existing households who have a TTP below \$50.</p> <p>The VASH special purpose vouchers are exempt from this policy. Minimum rent will be extended to the following the special programs FUP, EHV, FYI in accordance with the MTW Operations Notice. Each family impacted by the minimum rent will receive information on the Family Self-Sufficiency (FSS) program and has access to financial budgeting and employment coaching.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness; Self-sufficiency</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Decreased expenditures</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p><b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b></p>

New admissions and currently assisted households
<b>Does the MTW activity apply to all family types or only to selected family types?</b> The MTW activity applies only to selected family types
<b>Please select the family types subject to this MTW activity.</b> Non-elderly, non-disabled families
<b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b> The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
<b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b> This activity was implemented at the start of CY 2024, data is not yet available on how it aligned with our goals.
<b>Does this MTW activity require a hardship policy?</b> Yes  This document is attached.
<b>Does the hardship policy apply to more than this MTW activity?</b> Yes
<b>Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</b> 1.f. - Minimum Rent (HCV); 2.b. - Payment Standards- Fair Market Rents (HCV); 3.b. - Alternative Reexamination  Schedule for Households (HCV)
<b>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</b> No
<b>How many hardship requests have been received associated with this activity in the past year?</b> No hardship were requested in the most recent fiscal year.
<b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b> No
<b>Does the MTW activity require an impact analysis?</b> Yes  This document is attached.
<b>Does the impact analysis apply to more than this MTW activity?</b> No
<b>How much is the minimum rent or minimum Total Tenant Payment (TTP)?</b> \$50.00

<b>1.o. - Initial Rent Burden (HCV)</b>
<p><b>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</b></p> <p>NHHFA waived certain provisions of section 8(o)(3) of the 1937 Housing Act and 24 CFR 982.508. We raised the maximum family share at initial occupancy not to exceed 45%. The goal is to keep most families at 40% but used the exception for families who want to pay a higher amount to receive more housing opportunities. We will not allow the family share at initial occupancy to exceed 60% of the family's monthly income.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Housing choice</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Neutral (no cost implications)</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>This activity was implemented at the start of CY 2024, data is not yet available on how it aligned with our goals.</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>Does the MTW activity require an impact analysis?</b></p> <p>Yes</p> <p>This document is attached.</p>
<p><b>Does the impact analysis apply to more than this MTW activity?</b></p> <p>No</p>
<p><b>If the MTW agency plans to implement a new maximum income-based rent percentage (higher than 40% of adjusted monthly income), what is that maximum?</b></p> <p>45.00%</p>

<b>2.b. - Payment Standards- Fair Market Rents (HCV)</b>
<p><b>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</b></p> <p>Waiver of provisions of 24 CFR § 982.503: NHHFA set payment standard amounts between 80% and 120% of the Fair Market Rent (FMR).</p> <ul style="list-style-type: none"> <li>• Waiver of provisions of 24 CFR § 982.505: <ul style="list-style-type: none"> <li>o If the payment standard amount is increased during the term of the HAP contract, the increased payment standard amount shall be used to calculate the monthly housing assistance payment for the household at any time after the effective date of the increase, rather than waiting for the next regular reexamination.</li> <li>o If the household voucher size increases or decreases during the HAP contract term, the new household unit voucher size will be used to determine the payment standard amount for the family at any time after the effective date of the</li> </ul> </li> </ul>

change in family size, rather than waiting for the next regular reexamination.

- If the payment standard amount has decreased, during the term of a HAP contract, NHHFA will not reduce the payment standard as long as the HAP contract remains in effect. If the household moves to a new unit, NHHFA will apply the payment standard in effect at the time of the move.

**Which of the MTW statutory objectives does this MTW activity serve?**

Housing choice

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

Increased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

This activity was implemented at the start of CY 2024, data is not yet available on how it aligned with our goals.

**Does this MTW activity require a hardship policy?**

Provided Already

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

No

**Does the MTW activity require an impact analysis?**

Yes

This document is attached.

**Does the impact analysis apply to more than this MTW activity?**

No

**Please explain the payment standards by FMR:**

Waiver of provisions of 24 CFR § 982.503: NHHFA's payment standard amounts will be set between 80% and 120% of the Fair Market Rent (FMR).

### **3.b. - Alternative Reexamination Schedule for Households (HCV)**

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

NNHFA waived to 24 CFR 982.516 (a)(1). Our policy is NHHFA will conduct a reexamination of family income and composition at least triennially. NHHFA will allow at least one interim adjustment per year at the request of the household if the household gross income decreases by 10% or more.

Exceptions to this policy will include:

- Zero income households will be recertified every year.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Self-sufficiency

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

Decreased revenue

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

This activity was implemented for recerts starting with July in CY 2024, data is not yet available on how it aligned with our goals.

**Does this MTW activity require a hardship policy?**

Provided Already

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

No

**Does the MTW activity require an impact analysis?**

Yes

This document is attached.

**Does the impact analysis apply to more than this MTW activity?**

No

**What is the recertification schedule?**

Once every three years

**How many interim recertifications per year may a household request?**

2 or more

**Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.**

NHHFA conducts reexaminations at least triennially. Zero income households will be completed annually. The agency will allow at least one interim adjustment per year at the request of the household, if the gross income has decreased by 10% or more.

### **3.d. - Self-Certification of Assets (HCV)**

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

NHHFA allows self-certification of assets at reexamination up to \$50,000.

**Which of the MTW statutory objectives does this MTW activity serve?**



Cost effectiveness

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

NHHFA implemented this activity in September of 2023 this has assisted staff with completing streamlined certifications in a more efficient manner.

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

No

**Please state the dollar threshold for the self-certification of assets.**

\$50,000.

#### **5.a. - Pre-Qualifying Unit Inspections (HCV)**

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

NHHFA conducts pre inspections on units on an as needed basis. The pre inspection will be completed within 90 days of the participant occupying the unit. The participant will be able to request an interim inspection. HQS inspection standards at 24 CFR 982.401 will not be altered.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Housing choice

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

Neutral (no cost implications)

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

This activity was implemented in September of 2023, this has allowed NHHFA to be more efficient in its inspection and leasing process. It has allowed clients to move in quicker because there was not a wait for the inspection.

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

No

**How long is the pre-inspection valid for?**

The pre-inspection is valid for 90 days.

**5.d. - Alternative Inspection Schedule (HCV)**

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

NHHFA conducts inspections every three years for properties financed with Low Income Housing Tax Credits. Other units will be added to triennial inspections based on the quality of the unit and previous inspection results. All other unit inspections will be conducted biennially.

All units will be inspected at least once every three years, The participant may request an interim inspection. HQS standards as found at 24 CFR 982.401 will not be altered. HUD can conduct or request the agency to perform an inspection at any time for health and safety, as well as accessibility purposes.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness

**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)

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

This activity was implemented at the start of CY 2024, data is not yet available on how it aligned with our goals.

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

No

**6.b. - Short-Term Assistance (HCV)**

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

NHHFA may create a short-term housing assistance program with supportive services in its HCV program.

- The term of assistance will not be shorter than 3 months.
- The term of assistance will not be longer than 36 months.
- The short-term housing assistance program will include supportive services in one or more buildings (which may be in collaboration with local community-based organization and government agencies).
- Subject to availability, successful participants of the short-term housing assistance program will be given the option of transferring into the Housing Choice Voucher program.
- Under no circumstances will participants be required to participate in supportive services that are targeted to persons with disabilities in general, or persons with any specific disability.
- NHHFA will not require participation in supportive services as a condition for housing subsidy for elderly and disabled families.
- If NHHFA requires participation in supportive services as a condition for housing subsidy, an impact analysis will be developed and adopted in accordance with MTW guidance prior to the implementation of the activity.
- If NHHFA requires participation in supportive services as a condition for housing subsidy, a hardship policy will be developed and adopted in accordance with MTW guidance prior to the implementation of the activity.
- The activity will not be extended to the entire HCV program and will only serve specific populations.

**Which of the MTW statutory objectives does this MTW activity serve?**

Housing choice

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

Increased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

This activity has not yet been implemented.

**Does this MTW activity require a hardship policy?**

No

No document is attached.

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

No

**Does the MTW activity require an impact analysis?**

No

No document is attached.

**What is the term of assistance?**

36 months

**How is the tenant contribution established for this program?**

Flat rent or percentage of household income.

**How many households do you expect to serve in this program in the Fiscal Year?**

25

**How do you fulfill the obligation to offer participants in this program the opportunity to transition to the HCV or public housing (as applicable) program subject to availability?**

Establish a preference upon completion of the services or transition to permanent housing.

**Please list any partner organizations and briefly note the services that each provides.**

none at this time

### **9.a. - Increase PBV Program Cap (HCV)**

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

New Hampshire Housing Finance Authority (NHHFA) may increase the number of authorized units that it project-bases to not more than 50% of the lower of either the total authorized units or annual budget authority.

The intent of increasing the PBV Program Cap is to increase safe, affordable housing options to communities across the state. Increasing the number of PBV's demonstrates NHHFA's dedication to providing safe affordable housing to their communities.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Housing choice

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

Neutral (no cost implications)

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

This activity has yet to be implemented.

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

No

**What percentage of total authorized HCV units will be authorized for project-basing?**

50.00%

### **9.b. - Increase PBV Project Cap (HCV)**

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

NHHFA may increase the Project Based Voucher Cap up to 100%, allowing projects to be full PBV. The intent of increasing the PBV Program Cap is to increase safe, affordable housing options to communities across the state. Increasing the number of PBV's demonstrates NHHFA's dedication to providing safe affordable housing to their communities. NHHFA will use PIH notice 2013-27 where applicable or its successor.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Housing choice

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

Neutral (no cost implications)

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

This activity has yet to be implemented.

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

No