

Streamlined Annual PHA Plan (HCV Only PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024
--	---	---

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. The Form HUD-50075-HCV is to be completed annually by **HCV-Only PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, Small PHA, or Qualified PHA do not need to submit this form. Where applicable, separate Annual PHA Plan forms are available for each of these types of PHAs.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS and SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A.	PHA Information.																																			
A.1	<p> PHA Name: <u>New Hampshire Housing Finance Authority</u> PHA Code: <u>NH901</u> PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2023</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Housing Choice Vouchers (HCVs) <u>4,251</u> (including 340 Mainstream and 120 Emergency Housing Vouchers) PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at the main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. </p> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a joint Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th style="width: 25%;">Participating PHAs</th> <th style="width: 10%;">PHA Code</th> <th style="width: 25%;">Program(s) in the Consortia</th> <th style="width: 20%;">Program(s) not in the Consortia</th> <th style="width: 20%;">No. of Units in Each Program</th> </tr> </thead> <tbody> <tr> <td>Lead HA:</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	Lead HA:																													
Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program																																
Lead HA:																																				

B.	Plan Elements.
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>a) Have the following PHA Plan elements been revised by the PHA since its last Annual Plan submission?</p> <p>Y N</p> <p><input type="checkbox"/> X Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input type="checkbox"/> X Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> X Financial Resources.</p> <p><input type="checkbox"/> X Rent Determination.</p> <p><input type="checkbox"/> X Operation and Management.</p> <p><input type="checkbox"/> X Informal Review and Hearing Procedures.</p> <p><input type="checkbox"/> X Homeownership Programs.</p> <p><input type="checkbox"/> X Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.</p> <p><input type="checkbox"/> X Substantial Deviation.</p> <p>X <input type="checkbox"/> Significant Amendment/Modification.</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element(s):</p> <ul style="list-style-type: none"> • New Hampshire Housing Finance Authority (NHHFA) became a Moving to Work agency on December 1, 2022. Proposed changes to the PHA plan are attached. • NHHFA may add up to an additional 200 Project Based Voucher units. This activity is consistent with our PHA Plan because our Consolidated Plan identified the need to develop affordable rental housing for low and very-low-income families in the state to address the high housing cost burden for New Hampshire families.
B.2	New Activities. –
B.3	<p>Progress Report.</p> <ul style="list-style-type: none"> • NHHFA administers 449 Project based vouchers. • NHHFA administers 340 Mainstream vouchers. • NHHFA administers 134 FUP vouchers • NHHFA Administers 16 FYI vouchers • NHHFA administers 106 NED vouchers • NHHFA administers 189 VASH Vouchers • NHHFA administers 120 Emergency Housing Vouchers • NHHFA admitted 464 voucher participants (including Mainstream and Emergency Housing Vouchers) in CY 2022 • 13 FSS participants have graduated in CY 2022 • \$66,204 has been dispersed in escrow funds in CY 2022 • 558 participants have received homeownership counseling in CY 2022 • 11 Families have purchased a home through the HCV Homeownership program in CY 2022 • NHHFA has been designated as a “high performer” on its most recent SEMAP submission to HUD • NHHFA used special admin fees from EHV and Mainstream to provide landlord incentives, security deposits and application fees.
B.4	Capital Improvements. – Not Applicable
B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N N/A</p> <p><input type="checkbox"/> X <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
C.	Other Document and/or Certification Requirements.
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>

C.2	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p style="padding-left: 40px;">Y N</p> <p style="padding-left: 40px;"><input type="checkbox"/> X</p> <p>If yes, include Challenged Elements.</p>

D.	Affirmatively Furthering Fair Housing (AFFH).
-----------	--

D.1	<p>Affirmatively Furthering Fair Housing (AFFH).</p> <p>Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p>Fair Housing Goal:</p> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> </div> <div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p>Fair Housing Goal:</p> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> </div> <div style="border: 1px solid black; padding: 5px;"> <p>Fair Housing Goal:</p> </div>
-----	---

Describe fair housing strategies and actions to achieve the goal

Instructions for Preparation of Form HUD-50075-HCV Annual PHA Plan for HCV-Only PHAs

A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **Number of Housing Choice Vouchers (HCVs)**, **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan.

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

B. Plan Elements. All PHAs must complete this section. (24 CFR §903.11(c)(3))

B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.”

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR 5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR § 903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA’s reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for HCV. (24 CFR §903.7(b))

Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA’s anticipated resources, such as PHA HCV funding and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))

Rent Determination. A statement of the policies of the PHA governing rental contributions of families receiving tenant-based assistance, discretionary minimum tenant rents, and payment standard policies. (24 CFR §903.7(d))

Operation and Management. A statement that includes a description of PHA management organization, and a listing of the programs administered by the PHA. (24 CFR §903.7(e)).

Informal Review and Hearing Procedures. A description of the informal hearing and review procedures that the PHA makes available to its applicants. (24 CFR §903.7(f))

Homeownership Programs. A statement describing any homeownership programs (including project number and unit count) administered by the agency under section 8y of the 1937 Act, or for which the PHA has applied or will apply for approval. ([24 CFR §903.7\(k\)](#))

Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements. A description of any PHA programs relating to services and amenities coordinated, promoted, or provided by the PHA for assisted families, including those resulting from the PHA's partnership with other entities, for the enhancement of the economic and social self-sufficiency of assisted families, including programs provided or offered as a result of the PHA's partnerships with other entities, and activities subject to Section 3 of the Housing and Community Development Act of 1968 (24 CFR Part 135) and under requirements for the Family Self-Sufficiency Program and others. Include the program's size (including required and actual size of the FSS program) and means of allocating assistance to households. ([24 CFR §903.7\(l\)\(i\)](#)) Describe how the PHA will comply with the requirements of section 12(c) and (d) of the 1937 Act that relate to treatment of income changes resulting from welfare program requirements. ([24 CFR §903.7\(l\)\(iii\)](#)).

Substantial Deviation. PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. ([24 CFR §903.7\(r\)\(2\)\(i\)](#))

Significant Amendment/Modification. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan.

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

B.2 New Activities. This section refers to new capital activities which is not applicable for HCV-Only PHAs.

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. ([24 CFR §903.11\(c\)\(3\)](#), [24 CFR §903.7\(r\)\(1\)](#))

B.4 Capital Improvements. This section refers to PHAs that receive funding from the Capital Fund Program (CFP) which is not applicable for HCV-Only PHAs

B.5 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. ([24 CFR §903.7\(p\)](#))

C. Other Document and/or Certification Requirements.

C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. ([24 CFR §903.13\(c\)](#), [24 CFR §903.19](#))

C.2 Certification by State of Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. ([24 CFR §903.15](#)). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. ([24 CFR §903.7\(o\)](#)).

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) Strategies and actions must affirmatively further fair housing." Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the Annual PHA Plan. The Annual PHA Plan provides a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 6.02 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality

How the Public Housing Authority (PHA) Plan is consistent with the Consolidated Plan and the Analysis of Impediments to Fair Housing

The New Hampshire Consolidated Plan identified the high-cost burden for housing as a major need for New Hampshire households and families. New Hampshire Housing's Public Housing Authority Plan (PHA) is consistent with the Consolidated Plan and states that we will apply for Housing Choice Vouchers that become available, participate in the HUD Veterans Affairs Supportive Housing (VASH) program, support Project Based Voucher (PBV) production, Emergency Housing Vouchers, and continue the preference for rent burdened/at risk of homeless individuals. We have identified a preference for veterans and for victims of domestic violence, which is equal to the rent burdened/at risk of homeless preference.

The highest priorities identified in the Consolidated Plan were to develop and preserve affordable rental housing for low and very-low-income families. That priority is addressed in our PHA Plan through various preferences and programs that include supportive services and by applying for any new vouchers. To develop and preserve affordable rental housing, we remain supportive of new PBV production.

The PHA Plan is consistent with the Analysis of Impediments in the way that it addresses the Limited English Proficiency (LEP) law, Violence Against Women Act (VAWA), Lead Paint Poisoning Prevention, and all other Fair Housing Law requirements. The major impediments which can be addressed with the Housing Choice Voucher program include lack of affordable housing and discrimination of families with children due to lead in the home. In January of 2020 we were awarded \$4,983,542 federal Lead Hazard Control & Healthy Homes grant. An additional, \$3M in state funds were made available in conjunction with federal grant funds to support lead remediation of housing units where a child under 6 years of age and/or pregnant women resides. During this grant cycle 125 units have been cleared and 335 units have been cleared using state funds. New Hampshire Housing addresses the lack of affordable housing by maintaining high utilization of our current voucher baseline and by securing new vouchers when available. The discrimination of families with children due to lead in the home is addressed by administering the program well so that new owners will be encouraged to participate and by fair and equal administration of the Housing Quality Standards as it relates to lead in the home.



2023 Moving to Work (MTW) Activities

Draft
Proposed Effective Date July 1, 2023

Table of Contents

What is Moving to Work (MTW)	3
What are MTW activities?	3
How will MTW affect program participants and the community?.....	4
Asset building cohort participation.....	5
2023 MTW Activity Details	5
Tenant Rent Policies	6
Minimum rent.....	6
Initial Rent Burden (HCV)	8
Alternative Income Inclusions/Exclusions (HCV)	9
Payment standard and rent reasonableness	10
Payment standards-fair market rents (HCV)	10
Reexaminations	11
Alternative Reexamination Schedule for Households (HCV).....	11
Self-Certification of Assets (HCV).....	13
Landlord Leasing Incentives.....	13
Other Landlord Incentives (HCV - Tenant-Based Assistance)	13
Housing Quality Standards (HQS).....	14
Pre-Qualifying Unit Inspections (HCV).....	14
Alternative Inspection Schedules (HCV).....	14
Short-Term Assistance.....	14
Short-Term Assistance (HCV)	15
Project-Based Voucher Program Flexibilities	15
Increase PBV Program Cap (HCV).....	15
Increase PBV Project Cap (HCV)	16
Limit Portability for PBV Units (HCV)	16
MTW Self-Sufficiency Program.....	17
Agency Specific Waivers.....	17
Alternative Verification Hierarchy.....	17
Copy of Lease not required	19
Earned Income Disallowance (EID).....	20
MTW Hardship Policy.....	22
Resident Advisory Board Comment	25

What is Moving to Work (MTW)

Moving to Work (MTW) is a HUD program that gives housing authorities flexibilities regarding certain rules and regulations and allows the Public Housing Authority (PHA) to implement local changes that will benefit New Hampshire residents.

New Hampshire Housing (NHHFA) views participation in the MTW program as a powerful opportunity to leverage existing programs and partnerships to increase housing opportunities for low-income households, streamline program administration and improve client satisfaction and outcomes.

What are MTW activities?

MTW activities are ways that NHHFA will propose to operate differently than a standard housing authority. We will create strategies that best fit the local and statewide needs. Activities will be shared with the community, the Resident Advisory Board, and the Board of Directors to elicit feedback on changes before plans are submitted to HUD for approval.

The MTW program has three statutory objectives:

1. Reduce costs and achieve greater cost effectiveness
2. Promote economic self sufficiency
3. Expand housing choices for low-income families

How will MTW affect program participants and the community?

	Elderly/disabled	Non-Elderly/Non-disabled (families)	NED	FUP	EHV	VASH	Mainstream	FYI	Homeownership
Minimum rent		X		X					X
Initial rent burden (HCV)	X	X	X	X	X	X	X	X	
Alternative Income Inclusions/Exclusions (HCV)	X	X	X	X	X	X	X	X	X
Payment standards-fair market rents (HCV)	X	X	X	X	X	X	X	X	X
Alternative Reexamination Schedule for Households (HCV)	X	X	X	X	X	X	X	X	X
Self-Certification of Assets (HCV)	X	X	X	X	X	X	X	X	X
Other Landlord Incentives (HCV - Tenant-Based Assistance)	X	X	X	X	X	X	X	X	
Pre-Qualifying Unit Inspections (HCV)	X	X							
Alternative Inspection Schedules (HCV)	X	X	X	X	X	X	X	X	
Short-Term Assistance (HCV)	X	X							
Increase PBV Program Cap (HCV)	X	X							
Increase PBV Project Cap (HCV)	X	X							
Limit Portability for PBV Units (HCV)	X	X							
MTW Self-Sufficiency Program	X	X	X	X	X	X	X	X	X
Alternative Verification Hierarchy	X	X	X	X	X	X	X	X	X
Copy of Lease not required	X	X	X	X	X	X	X	X	
Earned Income Disallowance (EID)	X		X	X	X	X	X	X	X
Asset limit	X	X	X	X	X	X	X	X	X

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.

Asset building cohort participation

Under the Asset Building Cohort, NHHFA intends to implement the Opt-Out Savings Option for 500 participants with NHHFA providing a monthly deposit of \$25 per participant over a 24-month period, as further described below. All HCV households will be eligible, and NHHFA intends to randomly select participants (in consultation with the Asset Building Cohort evaluation team as appropriate). NHHFA will make monthly deposits into each participants escrow or personal savings accounts for 24 consecutive months; however, the funds may not be accessed by the participants until after the first 12 months. All participants will be required to have or obtain a banking account, and NHHFA will connect them with community banking resources. As an HCV-only administering PHA, this option will build on and align with other asset building programs administered by NHHFA, while offering the potential to increase savings and support asset building for 500 HCV participating households.

NHHFA’s goal in implementing the Opt-Out Savings Account Option is to encourage the growth of savings accounts and increase financial literacy and budgeting skills among HCV households. Through this initiative, participants will be able to accrue savings and improve their ability to develop and live within a household budget.

(A) Anticipated Number of Assisted Households Participating in Savings Program	500
(B) Anticipated Percentage of Assisted Households Participating in Savings Program	12%
(C) Anticipated Amount of Savings Contributed Per Household Per Month	\$25
Total PHA Investment Per Month (A) x (C)	\$12,500
Total PHA Investment Per Year (A) x (C) x 12 months	\$150,000
Total Anticipated PHA Investment for Life of Program (A) x (C) x 24 months	\$300,000

2023 MTW Activity Details

Upon approval from HUD, NHHFA plans to implement a variety of MTW Activities during the FY 2023 Plan year, including activities related to: tenant rent policies, payment standards,

reexamination frequency, landlord leasing incentives, Housing Quality Standards (HQS), the Project-Based Voucher (PBV) program, implementation of a short-term assistance program, and additional activities to streamline program operations.

A description of each activity is provided below. Where an activity is anticipated to have a financial impact NHHFA has included an impact analysis and hardship policy, as required. Additionally,

Tenant Rent Policies

Minimum rent

MTW Activity 1f

Activity Description

NHHFA’s minimum tenant rent (total tenant payment) is \$50.00. Elderly and disabled households are exempt from this activity. For existing households who have a TTP below \$50, the new minimum rent will be implemented within 90 days of the effective date of this MTW activity. New Admission families are notified of the minimum rent and hardship policy at intake and at each regular reexamination.

The VASH special purpose vouchers are exempt from this policy unless a waiver is approved by HUD. 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 receives information on the Family Self-Sufficiency (FSS) program and has access to financial budgeting and employment coaching. The goal is to help the family become economically self-sufficient.

Impact analysis

1. Impact on NHHFA’s finances
 - a. NHHFA will generate an additional revenue of approximately \$100,236 which will be used to assist in building the asset building program.
2. Impact on affordability of housing costs for affected families

	Non-Elderly/ Non-Disabled
Total Number of Households	837
Annual Total HAP	
Baseline	\$10,893,684
Proposed	\$10,793,448
Change in Annual Total HAP	(\$100,236)

Average Family Share	
Baseline	\$486
Proposed	\$496
Change in Average Family Share	(\$10)
Impact on Tenant (TRO/UAP)	
Households with No Change	661
Households with a Decrease	0
Average Decrease	-N/A-
Households with an Increase	176
Average Increase	\$47
Dollar Increase	
\$1 to 10	2
\$11 to \$25	6
\$26 to \$50	168

3. Impact on NHHFA's waiting list
 - a. It is not anticipated that there will be any impact to the waiting list.
4. Impact on the termination rate of families
 - a. It is not anticipated that there will be any impact to the termination rate for families.
5. Impact on NHHFA's current occupancy level in the HCV program
 - a. It is not anticipated that there will be any impact to the current occupancy level.
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and or housing choice
 - a. Implementation of this activity is cost effective. It also helps families promote self-sufficiency as they will need to make a financial contribution towards their rent.
7. Impact on the NHHFA's ability to meet statutory requirements
 - a. This activity does not impact NHHFA's ability to ensure that 75% of all new admissions are at or below 50% of the Area Median Income. NHHFA believes this is part of establishing a reasonable rent policy to encourage work and self-sufficiency of participating families. NHHFA will monitor new admissions and current participants to ensure continued assistance for substantially the same total number of eligible low-income households with MTW designation as without MTW designation. In addition, NHHFA will closely monitor assisted households to ensure continual assistance to a comparable mix of household by family size. Lastly, this activity has no negative impact on NHHFA's ability to ensure all housing assisted under the MTW demonstration meets Housing Quality Standards
8. Across the other factors above, the impact on protected classes

- a. NHHFA will ensure there will not be an impact on protected classes or any disparate impact. NHHFA will monitor the program to ensure that these programs do not adversely affect participation in, benefits of, or otherwise discriminate against persons on the basis of race, color, national origin, sex, religion, familial status, or disability or other protected classes. NHHFA's programs will be operated in a manner that is consistent with the requirements of nondiscrimination and equal opportunity authorities and will be accessible to persons with disabilities in accordance with the Fair Housing Act, Section 504 of the Rehabilitation Act, Titles II and III of the Americans with Disabilities Act, as applicable, and the Architectural Barriers Act.

Hardship policy

Eligibility: In order to be approved for a hardship exemption from minimum rent the household must meet the criteria as listed in Determining Eligibility for Financial Hardship.

In addition, the household must meet the following criteria:

- The household follows all program rules and regulations.
- The household does not owe NHHFA any money or is current/up to date with an existing repayment agreement.
- The household has completed an application for the FSS program; and
- The household has submitted a request for hardship within 15 business days from the date of the Minimum Rent Notification Letter to request an Informal Hearing and/or Hardship Review.

Timeframe: Households who qualify and receive wavier approval will have their tenant rent adjusted without the application of the minimum rent for a maximum period of 90 days beginning the month following the date of the family's request for a hardship exemption. At the end of the 90-day suspension period, NHHFA will reinstate the minimum rent.

Initial Rent Burden (HCV)

Activity Description

MTW activity 1o

NHHFA will raise the maximum family share at initial occupancy to 45%. The goal is to keep most families at 40% but would use the exception for families who want to pay a higher amount to receive more housing opportunities. It will apply to all assisted households as well as new admissions and currently assisted.

Impact analysis

1. Impact on NHHFA's finances
 - a. This is a cost/revenue neutral activity.

2. Impact on affordability of housing costs for affected families
 - a. This activity will allow families greater choices in their housing selections and costs.
3. Impact on NHHFA's waiting list
 - a. It is not anticipated that there will be any impact to the waiting list.
4. Impact on the termination rate of families
 - a. It is not anticipated that there will be any impact to the termination rate for families.
5. Impact on NHHFA's current occupancy level in the HCV program
 - a. This activity may increase the current occupancy level in the HCV program by allowing families more choices in their housing costs.
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, or housing choice
 - a. Implementation of this activity is helps families promote self-sufficiency and will increase their housing choice.
7. Impact on NHHFA's ability to meet statutory requirements
 - a. This activity does not impact NHHFA's ability to ensure that 75% of all new admissions are at or below 50% of the Area Median Income. NHHFA believes this is part of establishing a reasonable rent policy to encourage work and self-sufficiency of participating families. NHHFA will monitor new admissions and current participants to ensure continued assistance for substantially the same total number of eligible low-income households with MTW designation as without MTW designation. In addition, NHHFA will closely monitor assisted households to assure continual assistance to a comparable mix of household by family size. Lastly, this activity has no negative impact of NHHFA's ability to ensure all housing assisted under the MTW demonstration meets Housing Quality Standards
8. Across the other factors above, the impact on protected classes
 - a. NHHFA will ensure there will not be an impact on protected classes or any disparate impact. NHHFA will monitor the program to ensure that these programs do not adversely affect participation in, benefits of, or otherwise discriminate against persons on the basis of race, color, national origin, sex, religion, familial status, or disability or other protected classes?. NHHFA's programs shall be operated in a manner that is consistent with the requirements of nondiscrimination and equal opportunity authorities and will be accessible to persons with disabilities in accordance with the Fair Housing Act, section 504 of the Rehabilitation Act, Titles II and III of the Americans with Disabilities Act, as applicable, and the Architectural Barriers Act.

Alternative Income Inclusions/Exclusions (HCV)

Activity Description

MTW activity 1w

NHHFA will exclude gift income from the gross income calculation for all assisted households.

The VASH special program is exempt unless HUD approves a waiver. This is part of the rent simplification process and will also minimize the potential for errors. This exemption will apply to both new admissions and currently assisted households. This activity will support the cost effectiveness objective.

Cost implications

There are 16 families that have gift income counted towards their annual income. Obtaining verification of this income is an administrative burden. The deficit in HAP annually is \$8,500.

Payment standard and rent reasonableness

Payment standards-fair market rents (HCV)

Activity Description

MTW activity 2b

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).

- Waiver of provisions of 24 CFR § 982.505:
 - 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.
 - 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 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.

Hardship Impact

This activity is not projected to create a hardship for any households, as NHHFA will not decrease the payment standards during the term of a household's HAP contract and will increase the payment standard at the first reexamination following a change in voucher size or other applicable change in circumstance, rather than waiting until the household's next regular reexamination.

Impact analysis

1. Impact on NHHFA's finances
 - a. It is hard to determine the exact amount of HAP that will be spent. When determining payment standards for the yearly budget, costs are anticipated and used to determine affordability as well as market costs and impacts to households.

2. Impact on affordability of housing costs for affected families
 - a. There will no impact on the housing costs for households
3. Impact on NHHFA's waiting list
 - a. It is not anticipated that there will be any impact to the waiting list.
4. Impact on the termination rate of families
 - a. It is not anticipated that there will be any impact to the termination rate for families.
5. Impact on NHHFA's current occupancy level in the HCV program
 - a. This activity may increase the current occupancy level in the HCV program by allowing families to select market rate housing.
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, or housing choice
 - a. Implementation of this activity will increase their housing choice and allow NHHFA to set the payment standard according to current market conditions.
7. Impact on NHHFA's ability to meet statutory requirements
 - a. This activity does not impact NHHFA's ability to ensure that 75% of all new admissions are at or below 50% of the Area Median Income. NHHFA believes this is part of establishing a reasonable rent policy to encourage work and self-sufficiency of participating families. NHHFA will monitor new admissions and current participants to ensure continued assistance for substantially the same total number of eligible low-income households with MTW designation as without MTW designation. In addition, NHHFA will closely monitor assisted households to assure continual assistance to a comparable mix of household by family size. Lastly, this activity has no negative impact on NHHFA's ability to ensure all housing assisted under the MTW demonstration meets Housing Quality Standards
8. Across the other factors above, the impact on protected classes
 - a. NHHFA can ensure there will not be an impact on protected classes or any disparate impact. NHHFA will monitor the program to ensure that these programs do not adversely affect participation in, benefits of, or otherwise discriminate against persons on the basis of race, color, national origin, sex, religion, familial status, or disability or other protected bases. NHHFA's programs shall be operated in a manner that is consistent with the requirements of nondiscrimination and equal opportunity authorities and will be accessible to persons with disabilities in accordance with the Fair Housing Act, section 504 of the Rehabilitation Act, Titles II and III of the Americans with Disabilities Act, as applicable, and the Architectural Barriers Act.

Reexaminations

Alternative Reexamination Schedule for Households (HCV)

Activity Description

MTW activity 3a

Households will be required to recertify on a triennial basis.

Exceptions to this policy will include:

- Zero income households will be recertified every year.

Hardship Impact

This policy is not projected to create a hardship for any program households, as NHHFA has implemented a policy to increase the payment standard for households at any time after the effective date of the increase, rather than waiting until the next regular reexamination.

Therefore, no household will experience an increase in rent as a result of a triennial recertification cycle.

However, if a household can verify that the triennial frequency poses a financial hardship then NHHFA will review the request and, if approved, will conduct regular reexaminations for the household on an annual basis.

Impact analysis

1. Impact on NHHFA's finances
 - a. This waiver will have a large impact on staffing and increasing the cost effectiveness of the program. Industry standards for staff time to complete a recertification is on average 2 hours per household. By expanding recertifications to a triennial schedule it will save approximately 16,800 hours in staff time over a 3-year period.
2. Impact on affordability of housing costs for affected families
 - a. There will no impact on the housing costs for households
3. Impact on NHHFA's waiting list
 - a. It is not anticipated that there will be any impact to the waiting list.
4. Impact on the termination rate of families
 - a. It is not anticipated that there will be any impact to the termination rate for families.
5. Impact on NHHFA's current occupancy level in the HCV program
 - a. This activity may increase the current occupancy level in the HCV program by allowing families to select market rate housing.
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, or housing choice
 - a. Implementation of this activity will increase the cost effectiveness of program operations and staff time.
7. Impact on NHHFA's ability to meet statutory requirements
 - a. This activity does not impact NHHFA's ability to ensure that 75% of all new admissions are at or below 50% of the Area Median Income. NHHFA believes this is part of establishing a reasonable rent policy to encourage work and self-sufficiency of participating families. NHHFA will monitor new admissions and current participants to ensure continued assistance for substantially the same

total number of eligible low-income households with MTW designation as without MTW designation. In addition, NHHFA will closely monitor assisted households to assure continual assistance to a comparable mix of household by family size. Lastly, this activity has no negative impact on NHHFA's ability to ensure all housing assisted under the MTW demonstration meets Housing Quality Standards

8. Across the other factors above, the impact on protected classes
 - a. NHHFA can ensure there will not be an impact on protected classes or any disparate impact. NHHFA will monitor the program to ensure that these programs do not adversely affect participation in, benefits of, or otherwise discriminate against persons on the basis of race, color, national origin, sex, religion, familial status, or disability or other protected bases. NHHFA's programs shall be operated in a manner that is consistent with the requirements of nondiscrimination and equal opportunity authorities and will be accessible to persons with disabilities in accordance with the Fair Housing Act, section 504 of the Rehabilitation Act, Titles II and III of the Americans with Disabilities Act, as applicable, and the Architectural Barriers Act.

Self-Certification of Assets (HCV)

Activity Description

MTW activity 3c

At reexamination NHHFA will allow self-certification of assets up to \$50,000. This activity will support the cost effectiveness MTW statutory objectives. It will apply to all assisted households as well as new admissions and currently assisted. This is part of the rent simplification process and will also minimize the potential for errors. This activity will support the cost effectiveness MTW statutory objectives-

Cost implications.

This is a cost/revenue neutral activity. This will assist staff in streamlining activities which will result in reduced staff time.

Landlord Leasing Incentives

Other Landlord Incentives (HCV - Tenant-Based Assistance)

Activity Description

MTW activity 4c

The goal of this program is to provide a landlord incentive, or sign-on bonus, to encourage landlord acceptance of vouchers, develop and strengthen relationships, and improve the voucher holder's ability to lease up. The incentive program will provide landlords who rent to a voucher holder and execute a one-year minimum lease and HAP Contract with a one-time sign-on bonus. Security deposit assistance will be available on a limited basis.

One-time \$1,000 incentive for a new landlord (new to the program-first-time LL). Landlords who already participate in the HCV program can receive \$500 for every new lease and contract (excluding contract renewals).

Landlord Eligibility

- Does not include landlords who are related to the tenant (e.g., tenant has a reasonable accommodation to rent from a relative)
- Does not include a new payee for an Assignment/Change of Ownership.

Cost implications

Upon implementation NHHFA will evaluate the annual budget and determine if there are sufficient funds to support the program.

Housing Quality Standards (HQS)

Pre-Qualifying Unit Inspections (HCV)

Activity Description

MTW activity 5a

NHHFA will conduct pre inspections on project-based voucher units on an as needed basis. This activity will support the cost effectiveness MTW statutory objectives. It will apply to all PBV assisted households as well as new admissions.

Cost implications. This is a cost/revenue neutral activity. This will assist staff in streamlining activities which will result in reduced staff time.

Alternative Inspection Schedules (HCV)

Activity Description

MTW activity 5d

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

This activity will support the cost effectiveness MTW statutory objectives. It will apply to all assisted households as well as new admissions and currently assisted.

Cost implications

This is a cost/revenue neutral activity. This will assist staff in streamlining activities which will result in reduced staff time.

Short-Term Assistance

Short-Term Assistance (HCV)

Activity Description

MTW activity 6b

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 Section 8 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.

Project-Based Voucher Program Flexibilities

Increase PBV Program Cap (HCV)

Activity Description

MTW activity 9a

New Hampshire Housing Finance Authority (NHHFA) will 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.

This activity will support the cost effectiveness MTW statutory objectives. It will apply to all PBV assisted households as well as new admissions.

Cost implications

Upon implementation NHHFA will evaluate the annual budget and determine if PBV's are to be awarded as opportunities open.

Increase PBV Project Cap (HCV)

Activity Description

MTW activity 9b

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.

This activity will support the cost effectiveness MTW statutory objectives. It will apply to all PBV assisted households as well as new admissions.

Cost implications.

Upon implementation NHHFA will evaluate the annual budget and determine if PBV's are to be awarded as opportunities open.

Limit Portability for PBV Units (HCV)

Activity Description

MTW activity 9h

NHHFA will waive the requirement to provide a tenant-based voucher at 12-months and increase the requirement to not more than 24-months. Participants may request an exception to the rule if the current location of housing prevents gainful employment, financial hardship, or limits medical care. VAWA and reasonable accommodations are also exceptions to this waiver.

Participants who are currently housed in a PBV unit have secured safe and affordable housing. Extending the program requirement to 24-months may allow NHHFA to pull applicants on the wait list who are currently facing homelessness and having been waiting extended periods of time for assistance. This activity will support the cost effectiveness MTW statutory objectives. It will apply to all PBV assisted households as well as new admissions.

Cost implications

This is a cost/revenue neutral activity. This will assist staff in streamlining activities which will result in reduced staff time.

MTW Self-Sufficiency Program

Activity Description

MTW activity 11b

NHHFA will implement an MTW self-sufficiency program with the goal of creating opportunities to increase self-sufficiency for working families by incentivizing families who obtain new employment and remain continually employed.

- Incentivize families when they work for six consecutive months with a \$50 gift card
- Incentivize families with zero income or those who are not enrolled in the asset building cohort who subsequently become employed and work for six consecutive months with a \$50 gift card.

This activity will support the self-sufficiency MTW statutory objectives. It will apply to all working assisted households as well as new admissions.

Cost implications

NHHFA has budgeted \$25,000 for this activity in the initial year.

Agency Specific Waivers

Alternative Verification Hierarchy

Agency Specific Waiver

Activity Description

This activity waives HUD PIH Notice 2018-18 and successor notices to allow NHHFA to utilize an alternative streamlined method to verify household income for all HCV households.

1. Alter the verification hierarchy to the following:

Level	Verification Technique	Ranking
1	Up front income verification using HUD's EIV & IVT	Highest (Mandatory)
2	Upfront income verification no HUD system	Highest (Optional)
3	Written third party Verification OR written third party verification form OR Oral third-party verification	High (mandatory)
4	Self-Certification	High (Optional)

2. Extend the time that verifications are valid: for applicants, verifications may not be more than 180 days old at the time of voucher issuance.
3. For fixed income applicants and clients (Social Security award letters, fixed

pensions, and VA benefits, etc.) verifications are valid for the full calendar year in which they are effective.

Impact analysis

1. Impact on NHHFA's finances
 - a. This is a cost/revenue neutral activity. This will assist staff in streamlining activities which will result in reduced staff time.
2. Impact on affordability of housing costs for affected families
 - a. There will no impact on the housing costs for households
3. Impact on NHHFA's waiting list
 - a. It is not anticipated that there will be any impact to the waiting list.
4. Impact on the termination rate of families
 - a. It is not anticipated that there will be any impact to the termination rate for families.
5. Impact on NHHFA's current occupancy level in the HCV program
 - a. It is not anticipated that there will be any impact to occupancy level in the HCV program.
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, or housing choice
 - a. Implementation of this activity will increase the cost effectiveness of program operations and staff time.
7. Impact on NHHFA's ability to meet statutory requirements
 - a. This activity does not impact our ability to ensure that 75% of all new admissions are at or below 50% of the Area Median Income. NHHFA believes this is part of establishing a reasonable rent policy to encourage work and self-sufficiency of participating families. NHHFA will monitor new admissions and current participants to ensure continued assistance for substantially the same total number of eligible low-income households with MTW designation as without MTW designation. In addition, NHHFA will closely monitor assisted households to assure continual assistance to a comparable mix of household by family size. Lastly, this activity has no negative impact on NHHFA's ability to ensure all housing assisted under the MTW demonstration meets Housing Quality Standards
8. Across the other factors above, the impact on protected classes
 - a. NHHFA can ensure there will not be an impact on protected classes or any disparate impact. NHHFA will monitor the program to ensure that these programs do not adversely affect participation in, benefits of, or otherwise discriminate against persons on the basis of race, color, national origin, sex, religion, familial status, or disability or other protected bases. NHHFA's programs shall be operated in a manner that is consistent with the requirements of nondiscrimination and equal opportunity authorities and will be accessible to persons with disabilities in accordance with the Fair Housing Act, section 504 of

the Rehabilitation Act, Titles II and III of the Americans with Disabilities Act, as applicable, and the Architectural Barriers Act.

Copy of Lease not required

Agency Specific Waiver

Activity Description

NHHFA will not require a copy of the executed lease. NHHFA is not a party to the lease and will accept a certification form signed by the tenant and owner that certifies a lease has been executed, including the HUD-required tenancy addendum. NHHFA will maintain the lease certification form and tenancy addendum. This policy will streamline the lease up and lease renewal process.

Impact analysis

1. Impact on NHHFA's finances
 - a. This is a cost/revenue neutral activity. This will assist staff in streamlining activities which will result in reduced staff time.
2. Impact on affordability of housing costs for affected families
 - a. There will no impact on the housing costs for households
3. Impact on NHHFA's waiting list
 - a. It is not anticipated that there will be any impact to the waiting list.
4. Impact on the termination rate of families
 - a. It is not anticipated that there will be any impact to the termination rate for families.
5. Impact on NHHFA's current occupancy level in the HCV program
 - a. It is not anticipated that there will be any impact to occupancy level in the HCV program.
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, or housing choice
 - a. Implementation of this activity will increase the cost effectiveness of program operations and staff time.
7. Impact on NHHFA's ability to meet statutory requirements
 - a. This activity will not impact NHHFA's ability to ensure that 75% of all new admissions are at or below 50% of the Area Median Income. NHHFA believes this is part of establishing a reasonable rent policy to encourage work and self-sufficiency of participating families. NHHFA will monitor new admissions and current participants to ensure continued assistance for substantially the same total number of eligible low-income households with MTW designation as without MTW designation. In addition, NHHFA will closely monitor assisted households to assure continual assistance to a comparable mix of household by family size. Lastly, this activity has no negative impact on NHHFA's ability to ensure all housing assisted under the MTW demonstration meets Housing Quality Standards

8. Across the other factors above, the impact on protected classes
 - a. NHHFA can ensure there will not be an impact on protected classes or any disparate impact. NHHFA will monitor the program to ensure that these programs do not adversely affect participation in, benefits of, or otherwise discriminate against persons on the basis of race, color, national origin, sex, religion, familial status, or disability or other protected bases. NHHFA's programs shall be operated in a manner that is consistent with the requirements of nondiscrimination and equal opportunity authorities and will be accessible to persons with disabilities in accordance with the Fair Housing Act, section 504 of the Rehabilitation Act, Titles II and III of the Americans with Disabilities Act, as applicable, and the Architectural Barriers Act.

Earned Income Disallowance (EID)

Agency Specific Waiver

Activity Description

This activity eliminates the EID in 24 CFR Part 5.617. Existing households who currently have their rent calculated under EID as of the effective date of implementation of this policy will be allowed to continue the EID until it has concluded. This is being recommended only because it will be irrelevant when triennial recertifications are being completed.

Impact analysis

1. Impact on NHHFA finances
 - a. This is a cost/revenue neutral activity. This will assist staff in streamlining activities which will result in reduced staff time.
2. Impact on affordability of housing costs for affected families
 - a. There will no impact on the housing costs for households
3. Impact on NHHFA's waiting list
 - a. It is not anticipated that there will be any impact to the waiting list.
4. Impact on the termination rate of families
 - a. It is not anticipated that there will be any impact to the termination rate for families.
5. Impact on NHHFA's current occupancy level in the HCV program
 - a. It is not anticipated that there will be any impact to occupancy level in the HCV program.
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, or housing choice
 - a. Implementation of this activity will increase the cost effectiveness of program operations and staff time.
7. Impact on NHHFA's ability to meet statutory requirements
 - a. This activity will not impact NHHFA's ability to ensure that 75% of all new admissions are at or below 50% of the Area Median Income. NHHFA believes this is part of establishing a reasonable rent policy to encourage work and self-

sufficiency of participating families. NHHFA will monitor new admissions and current participants to ensure continued assistance for substantially the same total number of eligible low-income households with MTW designation as without MTW designation. In addition, NHHFA will closely monitor assisted households to assure continual assistance to a comparable mix of household by family size. Lastly, this activity has no negative impact on NHHFA's ability to ensure all housing assisted under the MTW demonstration meet Housing Quality Standards

8. Across the other factors above, the impact on protected classes
 - a. NHHFA can ensure there will not be an impact on protected classes or any disparate impact. NHHFA will monitor the program to ensure that these programs do not adversely affect participation in, benefits of, or otherwise discriminate against persons on the basis of race, color, national origin, sex, religion, familial status, or disability or other protected bases. NHHFA's programs shall be operated in a manner that is consistent with the requirements of nondiscrimination and equal opportunity authorities and will be accessible to persons with disabilities in accordance with the Fair Housing Act, section 504 of the Rehabilitation Act, Titles II and III of the Americans with Disabilities Act, as applicable, and the Architectural Barriers Act.

Agency Specific Waiver

Activity Description

Applicants will be determined ineligible for the Housing Choice Voucher Program at admission if they have more than \$100,000 in net assets or have a present ownership interest in a suitable home for which they have a legal right to reside and legal authority to sell, unless the home is being purchased with a voucher through the HUD Homeownership program or the family includes a person who is a victim of domestic violence or is offering the home for sale. Excluded from assets are interests in Indian trust land, equity in homes purchased with a voucher, equity accounts in HUD homeownership or FSS programs, certain inaccessible trust funds, retirement accounts, settlements or awards due to actions that resulted in the serious disability of a household member, tax-protected education savings accounts, personal property not of significant value, and real property that the family does not have legal authority to sell.

Impact analysis

1. Impact on NHHFA finances
 - a. This is a cost/revenue neutral activity. This will assist staff in streamlining activities which will result in reduced staff time.
2. Impact on affordability of housing costs for affected families
 - a. There will no impact on the housing costs for households
3. Impact on NHHFA's waiting list
 - a. It is not anticipated that there will be any impact to the waiting list. There are over 5,000 very low-income applicants. Most applicants do not have high assets.
4. Impact on the termination rate of families

- a. It is not anticipated that there will be any impact to the s termination rate for families.
- 5. Impact on NHHFA's current occupancy level in the HCV program
 - a. It is not anticipated that there will be any impact to occupancy level in the HCV program.
- 6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, or housing choice
 - a. Implementation of this activity will increase the cost effectiveness of program operations and staff time.
- 7. Impact on NHHFA's ability to meet statutory requirements
 - a. This activity does not impact NHHFA's ability to ensure that 75% of all new admissions are at or below 50% of the Area Median Income. NHHFA believes this is part of establishing a reasonable rent policy to encourage work and self-sufficiency of participating families. NHHFA will monitor new admissions and current participants to ensure continued assistance for substantially the same total number of eligible low-income households with MTW designation as without MTW designation. In addition, NHHFA will closely monitor assisted households to assure continual assistance to a comparable mix of household by family size. Lastly, this activity has no negative impact on NHHFA's ability to ensure all housing assisted under the MTW demonstration meets Housing Quality Standards
- 8. Across the other factors above, the impact on protected classes
 - a. NHHFA can ensure there will not be an impact on protected classes or any disparate impact. NHHFA will monitor the program to ensure that these programs do not adversely affect participation in, benefits of, or otherwise discriminate against persons on the basis of race, color, national origin, sex, religion, familial status, or disability or other protected bases. NHHFA's programs shall be operated in a manner that is consistent with the requirements of nondiscrimination and equal opportunity authorities and will be accessible to persons with disabilities in accordance with the Fair Housing Act, section 504 of the Rehabilitation Act, Titles II and III of the Americans with Disabilities Act, as applicable, and the Architectural Barriers Act.

MTW Hardship Policy

NHHFA is committed to the MTW Statutory Objectives to reduce cost, achieve greater cost effectiveness, give incentives to families who become economically self-sufficient and increase housing choices for eligible low-income families. NHHFA will adopt and implement the following activities listed below to achieve those objectives. The Hardship Policy is in place to determine when a requirement or provision of an MTW activity constitutes a financial or other hardship for

the family. Through this process NHHFA will review households' individual circumstances and respond accordingly.

General Hardship Policies

NHHFA has developed condition-based hardship policies as described below to address and mitigate financial hardships which may occur at enrollment or at any time during program participation. NHHFA's general hardship policies are outlined below:

- NHHFA will review its hardship policies with families during intake and recertification and will consider if a household qualifies for a hardship exemption at the time of a potential termination of assistance that is due to an MTW activity.
- There is no limit to the number of hardships that a household may receive. If a household is approved for a hardship, and subsequently experiences another adverse event while still in hardship status, the household may request an additional hardship.
- **Records:** NHHFA will retain records of all hardship requests received and the results of these requests and supply them at HUD's request. NHHFA will retain this information for the duration of NHHFA's participation in the MTW demonstration program and make such information available for public review and inspection at NHHFA's principal office during normal business hours.
- **Reasonable Accommodations:** When needed, NHHFA will modify its policies and procedures to accommodate the needs of a person with disabilities if it will not impose an undue financial or administrative burden or will result in a fundamental alteration in the nature of the program. NHHFA will follow the guidance outlined in its Administrative Plan pertaining to reasonable accommodations for persons with disabilities.

Hardship Process

Households who request a hardship will be subject to the hardship process outlined below:

- All hardship requests must be made in writing stating both the reason for the hardship and the expected duration.
- Upon submission of a hardship request, NHHFA will request verification of the hardship from the household. The hardship application will be considered complete once the household submits all requested supporting documentation.
- Upon submission of a complete hardship application, NHHFA will suspend the MTW activity for the household, beginning the next month after the request, until NHHFA has made a determination and has notified the household of the outcome of the request.
- All hardship requests will be reviewed by NHHFA's MTW Coordinator and/or other designated staff person, who will consult with the Director of Program Operations as needed.
- NHHFA will make a determination within fifteen (15) business days from the date of the completed hardship application.
- If it is determined that the household meets the hardship standards, NHHFA will notify the household in writing and will provide/continue to provide an exemption from the MTW activity. Approved hardships will remain in place for the time period established

according to the activity, at which time the household must reapply for hardship. If the household does not reapply or is not approved for a continued hardship, the rent will be re-calculated according to the pre-hardship conditions.

- If it is determined that the household does not meet the hardship standards, NHHFA will notify the household in writing and will resume the MTW activity. NHHFA may also make referrals to other local resources to assist the household.
- **Grievance Procedure:** If a hardship request is denied, NHHFA will provide the household with an opportunity to request an informal hearing for a second level review of the denied hardship request, consistent with NHHFA's informal hearing procedures as outlined in the HCV Administrative Plan.

Determining Eligibility for Financial Hardship

In order to be approved for a financial hardship the family must meet the following criteria:

1. The family has experienced a decrease in income because of changed circumstances, including loss or reduction of employment, death in the family, or reduction in or loss of earnings or other assistance; or
2. The family has experienced an increase in expenses, because of changed circumstances, for medical costs, childcare, transportation, education, or similar items.
3. The family is paying (or is projected to be paying) greater than 40% of monthly adjusted income towards rent and tenant-responsible utilities (based on NHHFA's utility allowance); and
4. The change is expected to last longer than sixty (60) days.

Note: Either (a) OR (b) must be true AND both (c) and (d) must be true, as listed above.

Resident Advisory Board Comments

The Resident Advisory Board (RAB) consists of 28 Housing Choice Voucher participants throughout the community who were contacted by email and volunteered to participate in this year's Moving to Work Proposal. There were six RAB members who met online to discuss each waiver.

All members were provided with a matrix diagram, explaining each MTW waiver, the populations impacted, goals/opportunities expected and the impact on the program. Members also reviewed the hardship policy and how it would impact people. RAB members thought it was fair and had no other comments.

1. Minimum Rent - \$50 (Implemented within 90 days for household's with TTP below \$50)

Concur: Members agreed that this would have an adjustment period for some clients, but it is a fair change. One RAB member mentioned that some people might need education around paying any amount of rent if they have never had to do this in the past. Education around budgeting and building credit would be beneficial as well.

Response: NHHFA will provide budgeting and case management to clients affected by the minimum rent.

2. Initial Rent Burden – 40% to 45%

Concur: Members agreed that this change would open more apartments at initial lease up and help get participants into units. The members shared concerns that it could tighten budgets for those participants and make future rent increases more difficult for them to afford.

3. Alternative Income Inclusions/Exclusions (exclude gift income from the gross income calculation for all assisted households)

Concur: Members agreed that this is a beneficial waiver and had no other comments or concerns.

4. Payment standards -fair market rents (between 80% - 120% of the FMR)

Concur: Members noted a change in payment standard due to household composition change is difficult for families.

Response: There is no change from our current policy. Payment standards are adjusted according to HUD regulation.

5. Alternative Reexamination Schedule (recertify on a triennial basis)

Concur: Members agreed that this waiver makes sense for the participants and the staff.

6. Self-Certification of Assets (up to \$50,000)

Members had no comments or concerns

7. Landlord Leasing Incentives

Encourages landlord acceptance of vouchers, develops, and strengthens relationships, and improves the voucher holder's ability to lease up. Program provides landlords who execute a one-year minimum lease with:

- **One-time \$1,000 incentive for a new landlord**
- **Participating Landlords receive up to \$500 for every new lease (excluding contract renewals).**

Concur: Members requested information about how effective the landlord incentive has been in gaining and retaining new landlords.

Response: NHHFA will update the members with the current information at the next RAB meeting.

8. Pre-Qualifying Unit Inspections (Inspect vacant units that are voucher and occupancy ready)

Members supported this waiver, no comments or concerns noted.

9. Alternative Inspection Schedules (every 3 years)

Members had no comments or concerns

10. Short-Term Assistance (NHHFA may create a short-term housing assistance program with supportive services)

Members want to continue to hear about a possible short term Assistance program and agreed there is a need in the community.

11. Increase PBV Program Cap

Members had no comments or concerns

12. Increase PBV Project Cap

Members had no comments or concerns

13. Limit Portability for PBV Units (Waive the requirement to provide a tenant-based voucher at 12-months and increase the requirement to not more than 24-months.)

Members supported this waiver, no comments or concerns noted.

14. MTW Self-Sufficiency Program

Members had no comments or concerns

15. Alternative Income Verification Hierarchy (Utilize an alternative streamlined method to verify household income.)

Members had no comments or concerns

16. Copy of Lease not required

Members had no comments or concerns

17. Earned Income Disallowance (Eliminates future EIDs)

Members had no comments or concerns

18. Asset limit (Applicants will be ineligible at admission if they have more than \$100,000 in net assets or have a present ownership interest in a suitable home.)

Members had no comments or concerns

19. Opt-Out Savings Option for 500 participants providing a monthly deposit of \$25 per participant over a 24-month period

Concur: RAB members were in favor of the Opt-Out Savings Option. They wanted to understand how we select families. Members had all favorable comments and no concerns.

Response: NHHFA will use an auto generated selection system.

Mary Osborne, a member of the RAB, reached out a few days after our meeting to reiterate how happy she was to be part of the process even though she did not have the same amount of experience on the program as some of the others. She also wanted to say again that she supports New Hampshire Housing's efforts to improve the Voucher Program efficiencies and turning those efficiencies into real help for the needy.