



2026 Moving to Work (MTW) Activities

Submitted to HUD -----, 2026

Draft
Proposed Effective Date July 1, 2026

Table of Contents

Introduction	3
What is Moving to Work (MTW)	3
What are MTW activities?	3
Asset building cohort participation	4
Proposed MTW Activities	4
Approved MTW Activities	4
1f Minimum rent	4
1n Utility Reimbursements	5
1o Initial Rent Burden (HCV)	5
2b Payment standards-fair market rents (HCV)	5
3a Alternative Reexamination Schedule for Households (HCV)	6
3c Self-Certification of Assets (HCV)	6
4b Damage Claims (HCV-Tenant Based Assistance)	6
5a Pre-Qualifying Unit Inspections (HCV)	7
5d Alternative Inspection Schedules (HCV)	7
17b Service Provision	8
Agency Specific Waivers	8
Alternative Verification Hierarchy	8
Activities not yet implemented	8
6b Short-Term Assistance (HCV)	9
9a Increase PBV Program Cap (HCV)	9
9b Increase PBV Project Cap (HCV)	10
9h Limit Portability for PBV Units (HCV)	10
Activities on Hold	10
4c Other Landlord Incentives (HCV - Tenant-Based Assistance)	10
Closed Out Activities	11
11b MTW Self-Sufficiency Program	11
MTW Hardship Policy	11
Administration	13
Resident Advisory Board Comment 12/18/2025	13
Public Hearing Comments	14
Appendix A : MTW Supplement (HUD 50075-MTW)	14
Appendix B : Public Notice	15

Introduction

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 proposes 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

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 partnerships.

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 has implemented the Opt-Out Savings Option starting with 500 participants with NHHFA providing a monthly deposit of \$25 per participant over a 24-month period, as further described below. All HCV households were eligible, and NHHFA randomly select participants (in consultation with the Asset Building Cohort evaluation team). 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.

As of 12/1/2025

Number of Assisted Households Participating in Savings Program	370
Percentage of selected Households Participating in Savings Program	74%
Savings Contributed Per Household Per Month	\$25
Total deposit amounts	\$166,500
Total withdrawn to date	\$12,750

This Program will end in June 2026 and will be moved to closed activities.

Proposed MTW Activities

No newly proposed activities this year. We are rewriting some existing approved activities.

Approved MTW Activities

1f Minimum rent

Plan Year Approved, Implemented, Amended

Approved FY2024, Implemented FY2024, Amended FY2025

Description

NHHFA's minimum tenant rent (total tenant payment) is \$130.00 (FY 2025). Elderly and disabled households are exempt from this activity. For existing households who have a TTP below \$130, 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. The minimum rent will be extended to the following 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.

1n Utility Reimbursements

Plan Year Approved, Implemented, Amended

Approved FY2025, Implemented FY2026

NHHFA will eliminate utility reimbursement payments when the utility allowance is greater than the total tenant payment.

1o Initial Rent Burden (HCV)

Plan Year Approved, Implemented, Amended

Approved FY2024, Implemented FY2024

Description

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.

2b Payment standards-fair market rents (HCV)

Plan Year Approved, Implemented, Amended

Approved FY2024, Implemented FY2024

Description

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.

3a Alternative Reexamination Schedule for Households (HCV)

Plan Year Approved, Implemented, Amended

Approved FY2024, Implemented FY2024

Amended in FY 2026

Description

NHHFA waived 24 CFR 982.516 (a)(1). Our policy is NHHFA will conduct a reexamination of family income composition at least triennially. NHHFA will allow at least one interim adjustment per year at the request of the household if the household income decreases by 10% or more. Exceptions to this policy will include zero income households that will be recertified each year.

Proposed 2026 New Wording

Under the initiative the following recertification policies would apply:

- Triennial recertifications for elderly/disabled families with fixed income only (SSA/SSI, pension, VA benefits)
- Annual recertifications for zero income households
- Biennial recertifications for all other MTW households.

No restrictions on interim recertification requests

3c Self-Certification of Assets (HCV)

Plan Year Approved, Implemented, Amended

Approved FY2024, Implemented FY2024

Description

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.

4b Damage Claims (HCV-Tenant Based Assistance)

Plan Year Approved, Implemented, Amended

Approved FY2024, Implemented FY2024, On Hold FY2025 except for FYI

Redesigned for 2026

Description

The goal of this program is to enhance the housing opportunities available to our households. One of the housing barriers is the ability of families to secure funds for security deposits. Assistance with a security deposit, also serves to reduce landlord concerns about damage and repairs above and beyond normal wear and tear. The security deposit program will be available on a limited basis.

Security Deposit Fee and Uses

- Security deposit assistance- The amount of the security deposit will not exceed up to one month's rent or the maximum allowed by NH state law.
- There is \$200,000 available in assistance money. If funds are depleted, we may transition to a security deposit guarantee program.
- The security deposit will be paid directly to the owner.
- Security deposits will be limited to one per household for a lifetime.
- Security deposit assistance will be tied to tenant education on "how to be a good tenant"?
- Security deposit assistance will be returned to the tenant at move-out with no requirement that it be repaid to NH Housing.

Cost implications

NHHFA may use funds received from HUD, HAP money or Admin fees reserves. 2026 plan year to allocate \$200,000 (\$96,000 EHV and \$104,000 Admin fee reserves).

5a Pre-Qualifying Unit Inspections (HCV)

Plan Year Approved, Implemented, Amended

Approved FY2024, Implemented FY2024

Description

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

5d Alternative Inspection Schedules (HCV)

Plan Year Approved, Implemented, Amended

Approved FY2024, Implemented FY2025

Description

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.

17b Service Provision

Plan Year Approved, Implemented, Amended

Approved FY2024, Implemented FY2025

Description

Use of our funding flexibility under the MTW program to create a Family Self Sufficiency grant program. This waiver will allow NHHFA to fund up to \$50,000 in administrative fees to assist HCV clients in reducing barriers to increasing their earned income and moving towards self-sufficiency. Program resources would be used for computers, education, and employment-related expenses, license, auto repairs/maintenance and other transportation needs.

Agency Specific Waivers

Alternative Verification Hierarchy

Plan Year Approved, Implemented, Amended

Approved FY2024, Implemented FY2024

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.

Activities not yet implemented

6b Short-Term Assistance (HCV)

Plan Year Approved, Implemented, Amended

Approved FY2024

Description

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.

9a Increase PBV Program Cap (HCV)

Plan Year Approved, Implemented, Amended

Approved FY2024

Description

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.

9b Increase PBV Project Cap (HCV)

Plan Year Approved, Implemented, Amended

Approved FY2024

Description

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.

9h Limit Portability for PBV Units (HCV)

Plan Year Approved, Implemented, Amended

Approved FY2024

Description

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.

Activities on Hold

4c Other Landlord Incentives (HCV - Tenant-Based Assistance)

Plan Year Approved, Implemented, Amended

Approved FY2024, Implemented FY2024, On Hold FY2025

Description

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.

Closed Out Activities

11b MTW Self-Sufficiency Program

FY2027 placing this incentive in the closed status

Plan Year Approved, Implemented, Amended

Approved FY2024, Implemented FY2025

Description

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.

MTW Hardship Policy

NHHFA is committed to the MTW Statutory Objectives to reduce costs, 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.

Administration

Resident Advisory Board Comment 12/18/2025

The Resident Advisory Board led by Ron Izzo, Supervisor, Rental Assistance/FSS, convened on December 18, 2025. The RAB members consisted of four HCV/FSS participants. Other staff from NH Housing attended as subject matter experts to support and give further discussion points. Members reviewed the Moving to Work (MTW) plan. Each proposed change was reviewed and discussed. The Board considered any negative or positive implications that would impact the HCV program as well as gaining an understanding of the intent of each change.

Proposed MTW Changes	Comments and Narrative
<u>Alternative Reexamination Schedule</u> Under the initiative the following recertification policies would apply: <ul style="list-style-type: none"> • Triennial recertifications for elderly/disabled families with fixed income only (SSA/SSI, pension, VA benefits) • Annual recertifications for zero income households • Biennial recertifications for all other MTW households. No restrictions on interim recertification requests	Resident Advisory Board (RAB) participants generally expressed support for the proposed alternative reexamination schedule. Participants noted that less frequent recertifications, particularly for elderly and disabled households with fixed incomes, would reduce administrative burden without negatively impacting program integrity. One participant indicated a preference for annual recertifications due to the predictability of the process; staff clarified that recertification notices are issued 120 days in advance for all households, regardless of reexamination frequency. Participants who would transition to a triennial reexamination cycle indicated support for the change. One participant inquired whether rent would continue to be reviewed annually while documentation would only be required every three years. This comment will be evaluated as part of the final development of the MTW Administrative Plan policies.

<p><u>Security Deposit Fee and Uses</u></p> <ul style="list-style-type: none"> • Security deposit assistance- The amount of the security deposit will not exceed what is allowed in accordance with NH state law. • There is \$200,000 available in assistance money. If funds are depleted, we may transition to a security deposit guarantee program. • The security deposit will be paid directly to the owner. • Security deposits will be limited to one per household for a lifetime. • Educate tenants on “how to be a good tenant”? • Leave it with the family and let them reuse it if they are a good tenant. 	<p>RAB participants expressed strong support for the proposed security deposit assistance, citing significant barriers to housing mobility due to the inability to accumulate sufficient funds for required security deposits. Several participants noted that the lack of deposit assistance has delayed or prevented moves to higher-quality housing.</p> <p>Participants responded favorably to the inclusion of a tenant education component and emphasized the need for improved understanding of tenant rights and landlord responsibilities, including state laws governing security deposits. Participants provided recommendations regarding content and delivery methods and suggested that a combination of instructional video and written materials would be an effective approach.</p> <p>Participants raised concerns regarding the proposed lifetime limitation on security deposit assistance, noting that housing costs may increase over time. One participant expressed a preference for a security deposit guarantee model that would allow repayment over time. Staff explained that the lifetime limitation was established due to finite funding availability and that the policy would be reviewed annually and modified as necessary.</p> <p>Participants also referenced pending New Hampshire legislation that could permit landlords to require security deposits of up to two months’ rent. Based on this feedback, the Authority will revise the policy language to clarify that security deposit assistance will not exceed the maximum amount permitted under New Hampshire state law.</p>
---	---

Public Hearing Comments

Appendix A : MTW Supplement (HUD 50075-MTW)

Appendix B : Public Notice

Legal Notice

Public Notice

The New Hampshire Housing Finance Authority will hold a Public Hearing on the Annual Agency Plan required under 24 CFR 903 on **Wednesday, February 11, 2026, at 12:30 p.m.** at New Hampshire Housing's offices located at 32 Constitution Drive, Bedford, NH. A copy of the proposed plan is available for review at the New Hampshire Housing's offices or on the website at www.nhhfa.org

For more information contact Gail Quinlan at (603) 472-8623.
(UL - Dec. 22)

DRAFT