### PHA Name: Rockford Housing Authority

PHA Code: IL022

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 10/1/2024

PHA Program Type: Combined

MTW Cohort Number: Landlord Incentives

MTW Supplement Submission Type: Annual Submission

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

The Rockford Housing Authority (RHA) is located in Winnebago County, Illinois. The RHA administers both the Public Housing and Housing Choice Voucher (HCV) programs and affordable housing options to all eligible households regardless of race, color, religion, sex, physical or mental handicap, familial status, national origin, or other protected class. The RHA is committed to providing quality, affordable housing that enhances the lives of its residents and promotes their independence. The RHA's mission is to create strategic partnerships with community stakeholders, design a diverse portfolio, and leverage social service programming to unite and ensure residents are provided with safe and nurturing environments that lead to self-sufficiency, responsibility, and individual empowerment.

The overall vision for the RHA's Moving to Work (MTW) program has been to create a quality housing model that transforms families from poverty to prosperity while sustaining the financial viability of the authority through the implementation of efficient business processes. Additionally, the RHA will develop and implement a comprehensive, integrated, and coordinated service delivery model that combines housing, coaching, mentoring, life skills and empowerment, education, and workforce development.

As an MTW Agency, the Rockford Housing Authority (RHA) will be given the flexibility and authority to develop policies outside the limitations of certain HUD regulations and provisions. This will allow RHA to achieve its mission and program goals at a higher level by leveraging the unique needs and concerns of the community and residents of Winnebago County. The MTW Program will allow the RHA to combine resources permitting the use of HUD funds to address local program priorities and needs better. The flexibilities allowed through the Moving-to-Work Program will support the RHA's vision of empowering residents to achieve self-sufficiency by increasing family housing opportunities, supporting deconcentrating assisted families, encouraging greater landlord participation, promoting landlord retention, and reducing administrative burdens.

The agency will utilize the MTW funding regulatory flexibility waivers and landlord incentives to market and promote the HCV program to high-performing landlords in the city and county that have yet to utilize the voucher program or have underutilized the program.

This MTW Supplemental Plan closely reflects our FY22 submission as we recently submitted it (March 14, 2023). There are five additional waiver requests we plan to implement with the submission of FY 2023: 5a. Pre-Qualifying Unit Inspections, 5d. Alternative Inspections Schedule, 9c. Eliminations of PBV Selections Process for PHA-Owned Projects without Improvement, Development or Replacement, 10a. PH Waive Operating a Required FSS Program (PH), and 10b. PH Waive Operating a Required FSS Program (HCV).

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

1. Tenant Rent Policies	
	Not O mostly broken actual
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
I. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
2. Payment Standards and Rent Reasonableness	, , , , , , , , , , , , , , , , , , , ,
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Currently Implementing
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
3. Reexaminations	The canonity implemented
a. Alternative Reexamination Schedule for Households (PH)	Not Currently Implemented
b. Alternative Reexamination Schedule for Households	Not Currently Implemented
(HCV)	
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Not Currently Implemented
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Not Currently Implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Currently Implementing
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Currently Implementing
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Plan to Implement in the Submission Year
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Plan to Implement in the Submission Year
6. Short-Term Assistance	·
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	1
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
	Thot ouriently implemented
8. Increase Elderly Age (PH & HCV)	

Increase Elderly Age (PH & HCV)	Not Currently Implemented							
9. Project-Based Voucher Program Flexibilities								
a. Increase PBV Program Cap (HCV)	Not Currently Implemented							
b. Increase PBV Project Cap (HCV)	Not Currently Implemented							
c. Elimination of PBV Selection Process for PHA-owned								
Projects Without Improvement, Development, or	Plan to Implement in the Submission Year							
Replacement (HCV)								
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented							
e. Alternative PBV Unit Types (Shared Housing and	Not Currently Implemented							
Manufactured Housing) (HCV)	, ,							
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented							
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented							
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented							
10. Family Self-Sufficiency Program with MTW Flexibility								
a.PH Waive Operating a Required FSS Program (PH)	Plan to Implement in the Submission Year							
a.HCV Waive Operating a Required FSS Program (HCV)	Plan to Implement in the Submission Year							
b.PH Alternative Structure for Establishing Program	Not Currently Implemented							
Coordinating Committee (PH)	Not outlettilly implemented							
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented							
c.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented							
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented							
d.PH Modify or Eliminate the Contract of Participation (PH)	Not Currently Implemented							
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented							
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented							
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented							
11. MTW Self-Sufficiency Program								
a.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented							
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented							
b.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented							
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented							
12. Work Requirement								
a. Work Requirement (PH)	Not Currently Implemented							
b. Work Requirement (HCV)	Not Currently Implemented							
13. Use of Public Housing as an Incentive for Economic F								
Use of Public Housing as an Incentive for Economic	logiess (Fil)							
Progress (PH)	Not Currently Implemented							
14. Moving on Policy								
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented							
b.PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented							
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented							
c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented							
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented							
15. Acquisition without Prior HUD Approval (PH)								
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented							
16. Deconcentration of Poverty in Public Housing Policy (PH)								
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented							
17. Local, Non-Traditional Activities	The canonity implemented							
	Not Currently Implemented							
a. Rental Subsidy Programs b. Service Provision	Not Currently Implemented							
D. SELVICE FIGUISION	Not Currently Implemented							

# C. MTW Activities Plan that Rockford Housing Authority Plans to Implement in the Submission Year or Is Currently Implementing

#### 2.b. - Payment Standards- Fair Market Rents (HCV)

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

The RHA has raised the payment standard to 120% of the Fair Market Rents (FMR). Housing choices are dwindling due to growing local market rents, limiting where RHA households can live. This activity is a remedy to this concern. The previous RHA payment standard was 110% of the FMR. The increase and payment of 120% of FMR have increased the payment standard by an average of \$105 for all bedroom sizes. We do not anticipate any cost implications as we are already at

120% FMR.

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

Housing choice

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

This is a new implementation, approved in March.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

No

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

No

How many hardship requests have been received associated with this activity in the past year?

No hardship were requested in the most recent fiscal year.

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

No

Please explain the payment standards by FMR:

We plan to continue to use a payment standard that is 120% of FMR.

#### 4.b. - Damage Claims (HCV-Tenant-based Assistance)

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

To incentivize a landlord's current participation in the HCV program, the RHA will allow owners to submit a damage claim of up to one month's contract rent. The amount of compensation may not exceed the lesser of the cost of damages or one month of contract rent. The amount of compensation may not exceed the lesser of the cost of damages or

one month of contract rent. Damages must be documented by and accepted by the RHA.

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

Housing choice

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

Increased revenue; Increased expenditures

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

The MTW activity applies to all assisted households

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

We submitted our FY22 MTW plan on March 14, 2022, and are currently implementing it.

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

No

Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?

To all units

What is the maximum payment that can be made to a landlord under this policy?

The amount of compensation may not exceed the lesser of the cost of damages or one month of contract rent.

How many payments were issued under this policy in the most recently completed PHA fiscal year?

0

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

\$0

### 4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)

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

The RHA has implemented a new sign-on bonus of up to \$1000 with a one-year contract beginning January 1, 2023. It has to be a new landlord that cannot be current or previous. They will also receive an additional \$250 for every five new units signed on. In addition to the current landlords, starting January 1, 2023, each new unit added will receive \$500 up to

\$2500 while funding is available.

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

Cost effectiveness; Housing choice

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

Increased revenue; Decreased expenditures

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

The MTW activity applies to all assisted households

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

This is a new implementation.

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

No

Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?

To all units

What is the maximum payment that can be made to a landlord under this policy?

\$2500

How many payments were issued under this policy in the most recently completed PHA fiscal year?

0

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

\$0

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

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

• This activity is to increase efficiency in operations and increase landlord participation. A pre-inspection may be conducted within 60 days of the participant occupying the unit. Inspections may be conducted at any time during the 60 days, and

previously conducted HQS inspections may be used.

The participant may request an interim inspection. HQS inspection standards will not be altered as found at 24 C.F.R.

982.401

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

Cost effectiveness; Housing choice

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

Plan to implement with approval.

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

No

How long is the pre-inspection valid for?

The pre-inspection is valid for 60 days.

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

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

- RHA will utilize MTW flexibility to change inspections from an annual to a biannual schedule for all HCV units in accordance with HQS inspection standards as outlined in 24 CFR 982.401. This change will reduce administrative burdens and related costs, leading to greater cost-effectiveness in federal expenditures. Properties must have two consecutive passed inspections to qualify for triennial inspections. Any property that fails an initial or biannual inspection will be held to an annual inspection schedule until such time that the unit passes two consecutive inspections.
- Clients may request an interim inspection after move-in as needed; RHA will not place limits on the number of interim inspections allowed.
- HUD may require that RHA perform an inspection at any time for health and safety, as well as accessibility purposes.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

Plan to implement with approval.

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

No

## 9.c. - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)

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

- RHA will be allowed to award project-based voucher units to properties owned by RHA, or a single-asset entity of RHA without engaging in a competitive selection process. RHA must currently engage in an administratively burdensome process to project-based units that begins with publishing a Request for Proposals (RFP) to solicit applications for any interested property owner. This activity would provide flexibility to award PBV vouchers to RHA owned units with a simplified process of having a Subsidy Layering Review conducted and ensuring the property is compliant with site selection requirements.
- RHA plans to use MTW flexibility to eliminate the selection process in the award of PBVs to properties owned by RHA that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site. This activity will help meet the MTW statutory objectives of reducing costs while achieving greater cost-effectiveness in federal expenditures and increasing housing choice.
- RHA will conduct a layering review before implementing this waiver.
- RHA will complete site-specific requirements.
- All impacted property must be owned by a single-asset entity per Notice PIH 2017-21.

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

Cost effectiveness; Housing choice

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

Decreased expenditures

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

Plan to implement with approval.

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

No

### 10.a.PH - Waive Operating a Required FSS Program (PH)

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

MTW can contribute to more options and choices towards assisting families within the Family Self-Sufficiency program to receive housing independence in reshaping a community to thrive. This will contribute to a combination of accessing flexibilities towards job training, educational opportunities, and supportive services. Integrating MTW activities within the RHA's FSS program allows us to customize these services based on the unique needs of their communities, potentially leading to higher effective outcomes.

It can create a more holistic approach to helping families move towards self-sufficiency. The MTW initiative flexibility allows RHA to experiment with various models integrating housing assistance with employment and other support services, in turn leading to a more comprehensive approach that addresses not only housing needs but also the underlying factors contributing to participants' instability.

By aligning our MTW initiative activities with the FSS program, we can develop new strategies to offer better incentives to families to increase their earnings. RHA's FSS program includes an escrow account allowing participants to accumulate savings as their income increases that contribute to self-sufficiency. Which of the MTW statutory objectives does this MTW activity serve? Self-sufficiency What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Neutral (no cost implications) Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies to all assisted households Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. N/A Does this MTW activity require a hardship policy? No No document is attached. Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does the MTW activity require an impact analysis?

No

No document is attached.

### 10.a.HCV - Waive Operating a Required FSS Program (HCV)

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

MTW can contribute to more options and choices towards assisting families within the Family Self-Sufficiency program to receive housing independence in reshaping a community to thrive. This will contribute to a combination of accessing flexibilities towards job training, educational opportunities, and supportive services. Integrating MTW activities within the RHA's FSS program allows us to customize these services based on the unique needs of their communities, potentially leading to higher effective outcomes.

It can create a more holistic approach to helping families move towards self-sufficiency. The MTW initiative flexibility allows RHA to experiment with various models integrating housing assistance with employment and other support services, in turn leading to a more comprehensive approach that addresses not only housing needs but also the underlying factors contributing to participants' instability.

By aligning our MTW initiative activities with the FSS program, we can develop new strategies to offer better incentives to families to increase their earnings. RHA's FSS program includes an escrow account allowing participants to accumulate

savings as their income increases that contribute to self-sufficiency.

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

Self-sufficiency
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.
Neutral (no cost implications)
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?
The MTW activity applies to all assisted households
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.
N/A
Does this MTW activity require a hardship policy?
No
No document is attached.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?
No
Does the MTW activity require an impact analysis?
No
No document is attached.

D.	Safe Harbor Waivers.					
D.4	Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?					
D.1	No Safe Harbor Waivers are being requested.					

E.	Agency-Specific Waiver(s).						
	Agency-Specific Waiver(s) for HUD Approval:						
	The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.						
E.1	In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.						
	For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.						
	Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?						
	No Agency-Specific Waivers are being requested.						
	Agency-Specific Waiver(s) for which HUD Approval has been Received:						
E.2	Does the MTW agency have any approved Agency-Specific Waivers?						
	MTW Agency does not have approved Agency-Specific Waivers						

F.	Public Housing Operating Subsidy Grant Reporting.						
F.1	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency.						

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2023	\$7,372,867	\$7,372,876	\$0	2023-12-31
2024	\$6,993,151	\$6,993,151	\$0	2024-12-31
2025	\$6,981,714	\$6,981,714	\$0	2025-12-31
2026	\$6,976,195	\$6,976,195	\$0	2026-12-31
2027	\$7,185,481	\$7,185,481	\$0	2027-12-31

G.	MTW Statutory Requirements.
	75% Very Low Income – Local, Non-Traditional.
G.1	HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.

Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income	32
49%-30% Area Median Income	34
Below 30% Area Median Income	111
Total Local, Non-Traditional Households	177

<sup>\*</sup>Local, non-traditional income data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

G.2 Establishing Reasonable Rent Policy.

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

G.3	Substantially the Same (STS) – Local, Non-Traditional.
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	285 # of unit months
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	279 # of unit months

Number of units developed under the local, non-traditional housing development activity that were available for occupancy during the prior full calendar year:

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	Type' is	# of Section 504 Accessible (Mobility)**	(**************************************	Was this Property Made Available for Initial	What was the Total Amount of MTW Funds Invested into the Property?
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### G.4 Comparable Mix (by Family Size) – Local, Non-Traditional.

To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix" of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.

Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	122
2 Person	83
3 Person	45
4 Person	22
5 Person	6
6+ Person	7
Totals	285

### H. Public Comment

Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.

No additional public hearing was held for an Agency-Specific Waiver and/or Safe Harbor waiver

### I. Evaluations.

No known evaluations.