Akron Metropolitan Housing Authority

MTW SUPPLEMENT

FY27

MTW SUPPLEMENT

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PHA Name : Akron Metropolitan Housing Authority

PHA Code : OH007
MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 1/1/2027
PHA Program Type: Combined
MTW Cohort Number: Stepped and Tiered Rent
MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

AMHA continues to envision an MTW Program that meaningfully increases local affordable housing choices, reduces administrative burdens and ultimately enhances the quality of housing and services, empowering all to reach their full potential. For fiscal year 2027, AMHA plans to expand on the cost effectiveness strategies proposed in its prior MTW Supplements and seeks to expand housing choice for our participants and community.

As part of MTW Cohort 2, AMHA is participating in the Tiered Rent Demonstration, which provides rent simplification for both staff and participants, encourages participant asset growth, and reduces administrative time by conducting triennial recertifications and decreasing interim certifications. Enrollment into the study is complete and AMHA looks forward to seeing the impact on administrative time and participant growth.

In 2027, AMHA plans to no longer count student financial aid or income from HUD's asset passbook rate. These changes will reduce the burden on our households to supply the information and encourage them towards self-sufficiency by building assets and continuing their education. These changes will also reduce cost within AMHA's programs by decreasing staff time spent on verifications and calculations.

Additionally, AMHA is introducing two project-based voucher program changes. First, project-based voucher households will need to remain in their unit for two years before moving to a tenant-based voucher. This change will result in fewer turnovers, allowing greater cost effectiveness. It also supports AMHA's partnership with the project-based voucher owners in our community, maintaining the housing choices our households currently have. Secondly, AMHA is expanding housing choice by no longer requiring project-based voucher households living in a wrong-sized unit (too small or too large) to move. If they would like to remain in their unit, they can, or they may move out if they prefer.

Finally, AMHA is adding a residency preference for the Mainstream voucher program. This change will achieve greater cost effectiveness because it provides consistency with AMHA's other voucher programs and it also helps serve our local community first.

These changes will continue to bolster AMHA's MTW goals as we expand housing options and implement efficiency strategies that maintain the integrity of serving low-income households, while also reducing regulatory administrative burdens.

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	
a. Tiered Rent (PH)	Currently Implementing
b. Tiered Rent (HCV)	Currently Implementing
r. Elimination of Deduction(s) (PH)	Currently Implementing
s. Elimination of Deduction(s) (HCV)	Currently Implementing
t. Standard Deductions (PH)	Currently Implementing
u. Standard Deductions (HCV)	Currently Implementing
v. Alternative Income Inclusions/Exclusions (PH)	Plan to Implement in the Submission Year
w. Alternative Income Inclusions/Exclusions (HCV)	Plan to Implement in the Submission Year
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Currently Implementing
b. Payment Standards- Fair Market Rents (HCV)	Currently Implementing
c. Rent Reasonableness – Process (HCV)	Currently Implementing
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Currently Implementing
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
c. Self-Certification of Assets (PH)	Currently Implementing
d. Self-Certification of Assets (HCV)	Currently Implementing
4. Landlord Leasing Incentives	
a. Vacancy Loss (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)	Currently Implementing
c. Third-Party Requirement (HCV)	Currently Implementing
6. Short-Term Assistance	
7. Term-Limited Assistance	
8. Increase Elderly Age (PH & HCV)	
9. Project-Based Voucher Program Flexibilities	
b. Increase PBV Project Cap (HCV)	Currently Implementing
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Currently Implementing
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Currently Implementing
h. Limit Portability for PBV Units (HCV)	Plan to Implement in the Submission Year
10. Family Self-Sufficiency Program with MTW Flexibility	
d.PH Modify or Eliminate the Contract of Participation (PH)	Currently Implementing
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Currently Implementing
11. MTW Self-Sufficiency Program	
12. Work Requirement	
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
Use of Public Housing as an Incentive for Economic Progress (PH)	Currently Implementing
14. Moving on Policy	
15. Acquisition without Prior HUD Approval (PH)	
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	
b. Service Provision	Currently Implementing

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

1.a. - Tiered Rent (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 See AMHA's FY22 MTW Supplement for a full description of this activity. A safe harbor request was submitted and approved with the FY22 MTW Supplement. All other safe harbor requirements are being met. AMHA began this activity with 7/1/23 certifications as part of the Rent Reform Demonstration. The Rent Reform Demonstration enrollment period for current households was 3/1/23-2/29/24 and for new admission households was 7/1/23-6/30/24. After the one year enrollment period for the Tiered Rent Demonstration, AMHA enrolled all eligible new admissions into tiered rent for one year (7/1/24-6/30/25). Beginning 7/1/25, AMHA is no longer enrolling additional households in the tiered rent program. Eligible households will participate in the Rent Reform Demonstration. This demonstration will divide them into two groups: standard rent calculation and tiered rent calculation. Current households chosen for the tiered rent calculation will be grouped by retrospective gross income into tiers and new admissions will be grouped by their current gross income into tiers. Within each tier, rents are fixed and are set to be affordable at the midpoint of the tier (safe harbor request previously submitted). Any income increase within a tier does not affect the household's rent/tenant contribution. Tiers are in $2,500 increments. Households will be eligible for hardships based on decreases in income, childcare expenses totaling $2,500 or more annually, having 6 or more dependents, change in full-time student status with earnings that would be excluded, and other circumstances as needed (e.g., death in the family, increased expenses, etc.). The goal of this MTW activity is to simplify the rent calculation process, reduce administrative burden, and reduce cost while achieving greater cost effectiveness in federal expenditures. The tiered rent policy is part of a larger rent reform initiative, which provides rent simplification for both staff and participants, encourages participant asset growth, and reduces administrative time by conducting triennial recertifications and decreasing interim certifications. AMHA staff will reduce their time spent on the certification processes through triennial recertifications, eliminating and/or standardizing deductions, determining rent using income tiers, and utilizing local methods for verification processes.
Which of the MTW statutory objectives does this MTW activity serve? Cost effectiveness; Self-sufficiency
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Decreased 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 only to a subset or subsets of assisted households
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? New admissions and currently assisted households
Does the MTW activity apply to all family types or only to selected family types? The MTW activity applies only to selected family types
Please select the family types subject to this MTW activity. Other – another specifically defined target population or populations.
If Other Selected in Previous Question: Please describe this target population in the text box. Non-elderly, non-disabled households currently or newly receiving an HCV or PH subsidy at the time of random

assignment.

The following households are excluded:

-Head, Co-Head, Spouse aged 56 or older

-Households in the homeownership program

-Current FSS participants

-PH flat rent households

-HCV 0 HAP households

-Special purpose vouchers: VASH, Mod Rehab (Certificate), Enhanced Voucher, Shelter Plus Care, Family Unification Program, Foster Youth, Emergency Housing Voucher, Mainstream, Tenant Protection Voucher-Mixed eligibility families

-Households living in Jobs Plus developments

-Households receiving Earned Income Disregard (EID) at RA

-Households living in developments that underwent a PBRA RAD conversion (not excluded if PBV conversion)

-Households in phase-in period under RAD protections

-Port-outs

-Households who are not yet indicated as disabled according to HUD definition, but: Have been approved to receive SSI/SSDI but have not yet received first payment, or have a pending SSI/SSDI application in (applied recently and waiting to learn of approval status)

Does the MTW activity apply to all public housing developments?

The MTW activity applies to specific developments

Which developments participate in the MTW activity?

OH007000003 Mohawk

OH007000008 Scattered Sites

OH007000014 Joy Park

OH007000015 Van Buren

OH007000024 Bon Sue

OH007000025 Valley View

OH007000029 Honey Locust Garden

OH007000030 Colonial Hills

OH007000034 Pinewood Gardens

OH007000039 Willow Run

OH007000040 Crimson Terrace

OH007000041 Maplewood Gardens

Not listed specifically because they do not have their own numbers in PIC: Barberton Scattered Sites (Crimson), Harding

Rd (Crimson), Jenkins Annex (Willow Run), Lobello Lane (Honey Locust), Maplewood Villa (Maplewood Gardens)

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.

AMHA began this activity along with the other Rent Reform Demonstration waivers (elimination of deductions and triennial reexaminations) with 7/1/23 certifications. The Rent Reform Demonstration enrollment period for current households was 3/1/23-2/29/24 and for new admission households, it was 7/1/23-6/30/24. In total, 3,667 households (HCV and LIPH) went through the Rent Reform Demonstration enrollment appointment and were randomly assigned to standard rent or tiered rent.

Due to the tiered rent program, which includes triennial reexaminations, AMHA has saved administrative time by no longer processing annual reexaminations for these households. AMHA estimates a reduction in processing annual reexaminations for approximately 2,050 households across the HCV and LIPH programs for the two years in-between their

tiered rent triennial reexaminations.

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

No

Please describe how the income bands are structured.

Each income band covers $2,500. Within each tier, the rent is set to be affordable at the midpoint of the tier (safe harbor request submitted with the Supplement submitted in April 2022). Households in the lowest tier (with gross income less than or equal to $2,499) will pay a minimum rent of $50. For all other tiers, the rent is equal to the midpoint of the tier divided by 12 times 28%. All households in a tier will have the same rent rather than calculating rent based on adjusted or gross income. HCV households will not pay higher than their gross rent (unit rent plus utilities) and LIPH households will

not pay higher than their unit’s flat rent plus utilities.

Please upload the tiered rent policy table that shows the income bands.

No document is attached.

What is the income basis for assigning households to income bands?

This activity uses a different definition of income because we are using the following MTW waivers (check all that apply)

1.r. and/or 1.s. “elimination of deductions”

1.b. - Tiered Rent (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

See AMHA's FY22 MTW Supplement for a full description of this activity. A safe harbor request was submitted and approved with the FY22 MTW Supplement. All other safe harbor requirements are being met. AMHA began this activity with 7/1/23 certifications as part of the Rent Reform Demonstration. The Rent Reform Demonstration enrollment period for current households was 3/1/23-2/29/24 and for new admission households was 7/1/23-6/30/24. After the one year enrollment period for the Tiered Rent Demonstration, AMHA enrolled all eligible new admissions into tiered rent for one year (7/1/24-6/30/25). Beginning 7/1/25, AMHA is no longer enrolling additional households in the tiered rent program.

Eligible households will participate in the Rent Reform Demonstration. This demonstration will divide them into two groups: standard rent calculation and tiered rent calculation. Current households chosen for the tiered rent calculation will be grouped by retrospective gross income into tiers and new admissions will be grouped by their current gross income into tiers. Within each tier, rents are fixed and are set to be affordable at the midpoint of the tier (safe harbor request previously submitted). Any income increase within a tier does not affect the household’s rent/tenant contribution. Tiers are in $2,500 increments. Households will be eligible for hardships based on decreases in income, childcare expenses totaling $2,500 or more annually, having 6 or more dependents, change in full-time student status with earnings that would be excluded, and other circumstances as needed (e.g., death in the family, increased expenses, etc.).

The goal of this MTW activity is to simplify the rent calculation process, reduce administrative burden, and reduce cost while achieving greater cost effectiveness in federal expenditures. The tiered rent policy is part of a larger rent reform initiative, which provides rent simplification for both staff and participants, encourages participant asset growth, and reduces administrative time by conducting triennial recertifications and decreasing interim certifications. AMHA staff will reduce their time spent on the certification processes through triennial recertifications, eliminating and/or standardizing

deductions, determining rent using income tiers, and utilizing local methods for verification processes.

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

Cost effectiveness; Self-sufficiency

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

Decreased 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 only to a subset or subsets of assisted households

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

Non-elderly, non-disabled households currently or newly receiving an HCV or PH subsidy at the time of random assignment.

The following households are excluded:

-Head, Co-Head, Spouse aged 56 or older

-Households in the homeownership program

-Current FSS participants

-PH flat rent households

-HCV 0 HAP households

-Special purpose vouchers: VASH, Mod Rehab (Certificate), Enhanced Voucher, Shelter Plus Care, Family Unification Program, Foster Youth, Emergency Housing Voucher, Mainstream, Tenant Protection Voucher-Mixed eligibility families

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-Port-outs

-Households who are not yet indicated as disabled according to HUD definition, but: Have been approved to receive SSI/SSDI but have not yet received first payment, or have a pending SSI/SSDI application in (applied recently and waiting to learn of approval status)

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

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

This MTW activity applies to all HCV tenant-based units and properties with project-based vouchers that have an eligible household living in them.

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.

AMHA began this activity along with the other Rent Reform Demonstration waivers (elimination of deductions and triennial reexaminations) with 7/1/23 certifications. The Rent Reform Demonstration enrollment period for current households was 3/1/23-2/29/24 and for new admission households, it was 7/1/23-6/30/24. In total, 3,667 households (HCV and LIPH) went through the Rent Reform Demonstration enrollment appointment and were randomly assigned to standard rent or tiered rent.

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

No

Please describe how the income bands are structured

Each income band covers $2,500. Within each tier, the rent is set to be affordable at the midpoint of the tier (safe harbor request submitted with the Supplement submitted in April 2022). Households in the lowest tier (with gross income less than or equal to $2,499) will pay a minimum rent of $50. For all other tiers, the rent is equal to the midpoint of the tier divided by 12 times 28%. All households in a tier will have the same rent rather than calculating rent based on adjusted or gross income. HCV households renting a unit with gross rent above the payment standard will be an exception. These households are responsible for the rent above the payment standard. HCV households will not pay higher than their gross rent (unit rent plus utilities) and LIPH households will not pay higher than their unit's flat rent plus utilities.

Please upload the tiered rent policy table that shows the income bands.

No document is attached.

What is the income basis for assigning households to income bands?

This activity uses a different definition of income because we are using the following MTW waivers (check all that apply)

1.r. and/or 1.s. “elimination of deductions”

1.r. - Elimination of Deduction(s) (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

See AMHA's FY22 MTW Supplement for a full description of this activity. All safe harbor requirements are being met. AMHA began this activity with 7/1/23 certifications as part of the Rent Reform Demonstration. The Rent Reform Demonstration enrollment period for current households was 3/1/23-2/29/24 and for new admission households was 7/1/23-6/30/24. After the one year enrollment period for the Tiered Rent Demonstration, AMHA enrolled all eligible new admissions into tiered rent for one year (7/1/24-6/30/25), which includes the elimination of deductions. Beginning 7/1/25, AMHA is no longer enrolling additional households in the tiered rent program.

As part of AMHA's tiered rent policy, households participating in this policy will not receive any deductions (e.g., unreimbursed child care expenses or dependent deductions) from their income. Elderly and disabled households are excluded from the tiered rent policy. In the Tiered Rent Demonstration, rent is calculated at 28% of gross income to lessen the impact on households. Households may also apply for a hardship, if applicable, to lessen the effect of the elimination of deductions. An impact analysis on this waiver was included with the Supplement submitted in April 2022. AMHA's goal for this activity, and for our rent reform policies in general, is to simplify the rent calculation process, reduce administrative burden, reduce cost and achieve greater cost effectiveness in federal expenditures. As part of AMHA's larger rent reform initiative, this activity will contribute to a reduction in AMHA staff time spent on the certification process through triennial recertifications, eliminating and/or standardizing deductions, determining rent using income tiers, and utilizing local methods for verification processes.

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.

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?

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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.

AMHA began this activity along with the other Rent Reform Demonstration waivers (tiered rent and triennial reexaminations) with 7/1/23 certifications. The Rent Reform Demonstration enrollment period for current households was 3/1/23-2/29/24 and for new admission households was 7/1/23-6/30/24. In total, 3,667 households (HCV and LIPH) went through the Rent Reform Demonstration enrollment appointment and were randomly assigned to standard rent or tiered rent.

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Does this MTW activity require a hardship policy?

Yes

This document is attached.

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

Yes

Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)

1.r. - Elimination of Deduction(s) (PH); 1.s. - Elimination of Deduction(s) (HCV); 3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)

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?

512.00

How many hardship requests were approved?

137

How many hardship requests were denied?

375

How many are pending?

0

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?

Provided Already

Which deduction(s) will be eliminated, modified, or added?

Dependent allowance; Unreimbursed childcare costs

1.s. - Elimination of Deduction(s) (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

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methods for verification processes.

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.

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?

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-Special purpose vouchers: VASH, Mod Rehab (Certificate), Enhanced Voucher, Shelter Plus Care, Family Unification Program, Foster Youth, Emergency Housing Voucher, Mainstream, Tenant Protection Voucher-Mixed eligibility families

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-Households who are not yet indicated as disabled according to HUD definition, but: Have been approved to receive SSI/SSDI but have not yet received first payment, or have a pending SSI/SSDI application in (applied recently and waiting to learn of approval status)

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

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

This MTW activity applies to all HCV tenant-based units and properties with project-based vouchers if an eligible household lives in the unit.

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.

AMHA began this activity along with the other Rent Reform Demonstration waivers (tiered rent and triennial reexaminations) with 7/1/23 certifications. The Rent Reform Demonstration enrollment period for current households was 3/1/23-2/29/24 and for new admission households was 7/1/23-6/30/24. In total, 3,667 households (HCV and LIPH) went through the Rent Reform Demonstration enrollment appointment and were randomly assigned to standard rent or tiered rent.

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Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Provided Already

Which deduction(s) will be eliminated, modified, or added?

Dependent allowance; Unreimbursed childcare costs

1.t. - Standard Deductions (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

--Standardized Medical Deduction:
See AMHA's FY23 MTW Supplement for a full description of this activity. All safe harbor requirements are being met. This activity has been approved by HUD and is currently being implemented by AMHA. AMHA began this activity with 7/1/24 annual/triennial certifications.

The standardized medical deduction will replace the existing deduction for unreimbursed medical expenses. Any qualifying household (a household where the head, co-head, or spouse is disabled or age 62 or older) that claims unreimbursed medical expenses will receive the standard deduction of $500. If the household believes their expenses are greater than $500, they may submit proof of expenses and receive a hardship if they qualify. This waiver is applicable for current households. It is not applicable for new admissions. An impact analysis and full hardship policy were submitted with the FY23 MTW Supplement.

AMHA's goal for this activity is to simplify the rent calculation process, lessen the administrative burden for staff and participants, and achieve greater cost effectiveness in federal expenditures. As part of AMHA's larger rent reform initiative, this activity will contribute to a reduction in AMHA staff time spent on the certification process through triennial recertifications, simplifying deductions, determining rent using income tiers, and utilizing local methods for verification processes.

--Set the medical/disability expense threshold to 5% of annual income:
See AMHA's FY25 MTW Supplement for a full description of this activity. All safe harbor requirements are being met. This activity has been approved by HUD. AMHA is waiting to implement this change until HOTMA medical/disability expense thresholds are enacted.

AMHA will replace the existing medical/disability deduction that has a threshold of 10 percent of annual income with a medical/disability deduction that has a threshold of 5 percent of annual income. The term "medical/disability deduction" here includes unreimbursed health and medical care expenses and unreimbursed reasonable attendant care and auxiliary apparatus expenses.

This activity will not apply to households who are under the tiered rent calculation method as those households are not eligible for deductions.

AMHA's goal for this activity is to simplify the rent calculation process, lessen the administrative burden for staff and participants, and achieve greater cost effectiveness in federal expenditures. As part of AMHA's larger rent reform initiative, this activity will contribute to a reduction in AMHA staff time spent on the certification process through triennial recertifications, simplifying deductions, determining rent using income tiers, utilizing local methods for verification processes, and allowing self-certification of assets and certain deductions.

An impact analysis and hardship policy were included with AMHA's FY25 submission.

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

Cost effectiveness; Self-sufficiency

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

Decreased 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 only to a subset or subsets of assisted households

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Elderly families; Disabled families (to the extent those families are not exempt via a reasonable accommodation)

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

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.
--Standardized Medical Deduction:
AMHA began this activity with 7/1/24 annual/triennial certifications. AMHA has updated its internal policy to clarify that this waiver is only applicable for current households, not for new admissions. AMHA has decreased staff time verifying medical expenses for more than 150 households per year since implementing this waiver.

--Medical Threshold to 5%:

n/a, waiting on HOTMA for implementation

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?
171.00

How many hardship requests were approved?

171

How many hardship requests were denied?

0

How many are pending?

0

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?

Provided Already

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

$500

1.u. - Standard Deductions (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

--Standardized Medical Deduction:
See AMHA's FY23 MTW Supplement for a full description of this activity. All safe harbor requirements are being met. This activity has been approved by HUD and is currently being implemented by AMHA. AMHA began this activity with 7/1/24 annual/triennial certifications.

The standardized medical deduction will replace the existing deduction for unreimbursed medical expenses. Any qualifying household (a household where the head, co-head, or spouse is disabled or age 62 or older) that claims unreimbursed medical expenses will receive the standard deduction of $500. If the household believes their expenses are greater than $500, they may submit proof of expenses and receive a hardship if they qualify. This waiver is applicable for current households. It is not applicable for new admissions. An impact analysis and full hardship policy were submitted with the FY23 MTW Supplement.

AMHA's goal for this activity is to simplify the rent calculation process, lessen the administrative burden for staff and participants, and achieve greater cost effectiveness in federal expenditures. As part of AMHA's larger rent reform initiative, this activity will contribute to a reduction in AMHA staff time spent on the certification process through triennial recertifications, simplifying deductions, determining rent using income tiers, and utilizing local methods for verification processes.

--Set the medical/disability expense threshold to 5% of annual income:
See AMHA's FY25 MTW Supplement for a full description of this activity. All safe harbor requirements are being met. This activity has been approved by HUD. AMHA is waiting to implement this change until HOTMA medical/disability expense thresholds are enacted.

AMHA will replace the existing medical/disability deduction that has a threshold of 10 percent of annual income with a medical/disability deduction that has a threshold of 5 percent of annual income. The term "medical/disability deduction" here includes unreimbursed health and medical care expenses and unreimbursed reasonable attendant care and auxiliary apparatus expenses.

This activity will not apply to households who are under the tiered rent calculation method as those households are not eligible for deductions.

AMHA's goal for this activity is to simplify the rent calculation process, lessen the administrative burden for staff and participants, and achieve greater cost effectiveness in federal expenditures. As part of AMHA's larger rent reform initiative, this activity will contribute to a reduction in AMHA staff time spent on the certification process through triennial recertifications, simplifying deductions, determining rent using income tiers, utilizing local methods for verification processes, and allowing self-certification of assets and certain deductions.

An impact analysis and hardship policy were included with AMHA's FY25 submission.

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

Cost effectiveness; Self-sufficiency

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

Decreased 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 only to a subset or subsets of assisted households

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Elderly families; Disabled families (to the extent those families are not exempt via a reasonable accommodation)

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

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

Applies to all tenant-based units and project-based vouchers with eligible 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.
--Standardized Medical Deduction:
AMHA began this activity with 7/1/24 annual/triennial certifications. AMHA has updated its internal policy to clarify that this waiver is only applicable for current households, not for new admissions. AMHA has decreased staff time verifying medical expenses for more than 150 households per year since implementing this waiver.

--Medical Threshold to 5%:

n/a, waiting on HOTMA for implementation

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Provided Already

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

$500

1.v. - Alternative Income Inclusions/Exclusions (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
--Exclude Financial Aid Income:
Exclude all income from student financial aid. A safe harbor request is being submitted with this Supplement to apply this waiver to elderly and disabled individuals.

The goal for this activity is to encourage households towards self-sufficiency through education without fear of increased rent due to financial aid income. In addition, this activity will simplify the rent calculation process, lessen the administrative burden for staff and participants, and achieve greater cost effectiveness in federal expenditures. As part of AMHA's larger rent reform initiative, this activity will contribute to a reduction in AMHA staff time spent on the certification process through triennial recertifications, simplifying deductions, determining rent using income tiers, utilizing local methods for verification processes, and allowing self-certification of assets and certain deductions.

--Discontinue passbook rate:
AMHA will no longer use HUD's passbook rate to determine income from assets. Instead, AMHA will count only the true income earned on any household assets toward the rent calculation, regardless of the value of the assets. A safe harbor request is being submitted with this Supplement to apply this waiver to elderly and disabled individuals.

The goal for this activity is to increase self-sufficiency by encouraging households to build their assets without counting arbitrary income on the assets that are not truly received by the household. In addition, this activity will simplify the rent calculation process, lessen the administrative burden for staff and participants, and achieve greater cost effectiveness in federal expenditures. As part of AMHA's larger rent reform initiative, this activity will contribute to a reduction in AMHA staff time spent on the certification process through triennial recertifications, simplifying deductions, determining rent using income tiers, utilizing local methods for verification processes, and allowing self-certification of assets and certain deductions.

--Ending the Earned Income Disallowance (EID):
This waiver has been discontinued due to HOTMA sections 102 and 104, which ended the EID for all households. A safe

harbor request was submitted and approved with the FY24 MTW Supplement, but has also been discontinued.

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

Cost effectiveness; Self-sufficiency

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

Decreased revenue; 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.

New waiver request for FY27.

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

What inclusions or exclusions will be eliminated, modified, or added?

Add exclusions for student financial aid and any income generated by HUD's asset passbook rate.

1.w. - Alternative Income Inclusions/Exclusions (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
--Exclude Student Financial Aid Income:
Exclude all income from student financial aid. A safe harbor request is being submitted with this Supplement to apply this waiver to elderly and disabled individuals.

The goal for this activity is to encourage households towards self-sufficiency through education without fear of increased rent due to financial aid income. In addition, this activity will simplify the rent calculation process, lessen the administrative burden for staff and participants, and achieve greater cost effectiveness in federal expenditures. As part of AMHA's larger rent reform initiative, this activity will contribute to a reduction in AMHA staff time spent on the certification process through triennial recertifications, simplifying deductions, determining rent using income tiers, utilizing local methods for verification processes, and allowing self-certification of assets and certain deductions.

--Discontinue passbook rate:
AMHA will no longer use HUD's passbook rate to determine income from assets. Instead, AMHA will count only the true income earned on any household assets toward the rent calculation, regardless of the value of the assets. A safe harbor request is being submitted with this Supplement to apply this waiver to elderly and disabled individuals.

The goal for this activity is to increase self-sufficiency by encouraging households to build their assets without counting arbitrary income on the assets that are not truly received by the household. In addition, this activity will simplify the rent calculation process, lessen the administrative burden for staff and participants, and achieve greater cost effectiveness in federal expenditures. As part of AMHA's larger rent reform initiative, this activity will contribute to a reduction in AMHA staff time spent on the certification process through triennial recertifications, simplifying deductions, determining rent using income tiers, utilizing local methods for verification processes, and allowing self-certification of assets and certain deductions.

--Ending the Earned Income Disallowance (EID):
This waiver has been discontinued due to HOTMA sections 102 and 104, which ended the EID for all households. A safe

harbor request was submitted and approved with the FY24 MTW Supplement, but has also been discontinued.

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

Cost effectiveness; Self-sufficiency

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

Decreased revenue; 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.

New waiver request for FY27.

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

What inclusions or exclusions will be eliminated, modified, or added?

Add exclusions for student financial aid and any income generated by HUD's asset passbook rate.

2.a. - Payment Standards- Small Area 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
--Allow Payment Standards between 80-150% of SAFMRs

See AMHA's FY25 MTW Supplement for a full description of this activity. All safe harbor requirements are being met. This activity has been approved by HUD, but has not yet been implemented. AMHA plans to implement it, if needed, when reviewing the SAFMRs for 2027.

AMHA may allow payment standards between 80-150 percent of Small Area Fair Market Rent (SAFMR). AMHA will review the SAFMRs and utilize a payment standard between 80-150 percent of the SAFMRs as needed. The payment standard in effect for each grouped ZIP code area will be within the basic range (80-150%) of the SAFMR for each ZIP code area in the group.

The goal of this activity is to increase housing choice for AMHA's participants by meeting the cost needs of different parts of AMHA's jurisdiction. The option of higher payment standards are part of a larger initiative to increase and retain the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity. This activity also supports the goal of cost effectiveness by minimizing the changes to AMHA's per family contribution in an effort to stabilize the payment standard changes due to SAFMRs.

An impact analysis and hardship policy were included with AMHA's FY25 Supplement.

--Payment Standard Increases Only during Regular, Interim, or Rent Increase Certifications
See AMHA's FY25 MTW Supplement for a full description of this activity. All safe harbor requirements are being met. This activity has been approved by HUD and has been implemented.

If the payment standard amount is increased during the term of the HAP contract, AMHA will use the increased payment standard amount to calculate the monthly housing assistance payment for the family no later than the earliest of:
• 1. The effective date of an increase in the gross rent that would result in an increase in the family share; or
• 2. The family's first regular or interim reexamination.

AMHA's goal for this activity is to reduce administrative time. 24 CFR 982.505(c)(4) requires PHAs to update the payment standard within one year of the effective date of the payment standard amount. AMHA has moved many of its households to triennial recertifications with MTW waivers and so processing an annual certification solely to update payment standards would be burdensome. Therefore, this activity supports the goal of cost effectiveness. In addition to AMHA's rent reform initiative, this activity will contribute to a reduction in AMHA staff time spent on the certification process for participants through triennial recertifications, standardizing medical deductions, and utilizing local methods for verification processes.

An impact analysis and hardship policy were included with AMHA's FY25 Supplement.

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 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.
--Allow Payment Standards between 80-150% of SAFMRs:
N/A, have not needed to implement yet

--Payment Standard Increases Only during Regular, Interim, or Rent Increase Certifications:
This waiver has decreased AMHA's administrative burden by not requiring us to process a certification payment standard amount within one year of its update. Many of our households are on triennial recertification cycles and so a payment standard update would have required an additional certification solely for that purpose. AMHA estimates this waiver saves

approximately 1,000 certifications over a two year period.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

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

Yes

Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)

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

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?

Provided Already

Please explain the payment standards by ZIP code or "grouped" ZIP codes:
--Allow Payment Standards between 80-150% of SAFMRs:
AMHA was required to institute SAFMRs as of 1/1/25. AMHA will use the prescribed SAFMR requirements, but may set payment standards between 80-150 percent of the SAFMR.

--Payment Standard Increases Only during Regular, Interim, or Rent Increase Certifications:

Not applicable.

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
--Allow Payment Standards between 80-120% of FMRs:
See AMHA's FY25 MTW Supplement for a full description of this activity. All safe harbor requirements are being met. This activity has been approved by HUD, but has not yet been implemented. AMHA plans to implement it, if needed, when reviewing the FMRs for 2027.

AMHA may allow payment standards between 80-120 percent of Fair Market Rent (FMR). AMHA moved to utilizing SAFMRs beginning 1/1/25, but will continue to use FMRs for the project-based voucher program.

The goal of this activity is to increase housing choice for AMHA’s participants by meeting the cost needs of different parts of AMHA’s jurisdiction. The option of higher payment standards are part of a larger initiative to increase and retain the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity. This activity also supports the goal of cost effectiveness by minimizing the changes to AMHA’s per family contribution in an effort to stabilize the payment standard changes due to SAFMRs.

An impact analysis and hardship policy were included with AMHA’s FY25 Supplement.

--Payment Standard Increases Only during Regular, Interim, or Rent Increase Certifications
See AMHA's FY25 MTW Supplement for a full description of this activity. All safe harbor requirements are being met. This

activity has been approved by HUD and has been implemented.

If the payment standard amount is increased during the term of the HAP contract, AMHA will use the increased payment standard amount to calculate the monthly housing assistance payment for the family no later than the earliest of:
• 1. The effective date of an increase in the gross rent that would result in an increase in the family share; or
• 2. The family's first regular or interim reexamination.

AMHA's goal for this activity is to reduce administrative time. 24 CFR 982.505(c)(4) requires PHAs to update the payment standard within one year of the effective date of the payment standard amount. AMHA has moved many of its households to triennial recertifications with MTW waivers and so processing an annual certification solely to update payment standards would be burdensome. Therefore, this activity supports the goal of cost effectiveness. In addition to AMHA's rent reform initiative, this activity will contribute to a reduction in AMHA staff time spent on the certification process for participants through triennial recertifications, standardizing medical deductions, and utilizing local methods for verification processes.

An impact analysis and hardship policy were included with AMHA's FY25 Supplement.

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 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.
--Allow Payment Standards between 80-120% of FMRs:
N/A, have not needed to implement yet

--Payment Standard Increases Only during Regular, Interim, or Rent Increase Certifications:
This waiver has decreased AMHA's administrative burden by not requiring us to process a certification payment standard amount within one year of its update. Many of our households are on triennial recertification cycles and so a payment standard update would have required an additional certification solely for that purpose. AMHA estimates this waiver saves

approximately 1,000 certifications over a two year period.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Provided Already

Please explain the payment standards by FMR:
--Allow Payment Standards between 80-120% of FMRs:
AMHA was required to institute SAFMRs as of 1/1/25. AMHA will use the prescribed SAFMR requirements for tenant-based vouchers, but will continue to utilize FMRs for project-based vouchers. AMHA may set payment standards between 80-120 percent of the FMR for project-based vouchers.

--Payment Standard Increases Only during Regular, Interim, or Rent Increase Certifications

Not applicable.

2.c. - Rent Reasonableness – Process (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 See AMHA's FY25 MTW Supplement for a full description of this activity. All safe harbor requirements are being met. This activity has been approved by HUD and has been implemented. AMHA will not require a reasonable rent redetermination if there is a 10 percent decrease in the published FMR/SAFMR in effect 60 days before the contract anniversary as compared with the FMR/SAFMR in effect 1 year before the contract anniversary. AMHA will allow the previously determined rent to stand until a landlord requests a rent redetermination. The goal of this activity is to achieve greater cost effectiveness, reduce administrative burden, and increase housing choice This activity is part of a larger initiative to increase and retain the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity. AMHA has included this activity in its HCVP Administrative Plan. At HUD's request, AMHA will obtain the services of a third-party entity to determine rent reasonablenesss for PHA-owned units.
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 expenditures; 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. No changes have been made to this waiver. AMHA will not need to apply this waiver unless there is a 10 percent decrease in the published FMR/SAFMR.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
Describe the method used to determine rent reasonableness and the motivations for using a method different from the standard method. AMHA will not conduct a reasonable rent redetermination if there is a 10 percent decrease in the published FMR/SAFMR in effect 60 days before the contract anniversary as compared with the FMR/SAFMR in effect 1 year before the contract anniversary. AMHA will only conduct reasonable rent redeterminations when requested by a landlord. AMHA believes this method will strengthen our partnership with landlords in our community by continuing to support the agreed upon contract rent amount and will maintain the supply of affordable housing with rent continuity for participants.

2.d. - Rent Reasonableness – Third-Party Requirement (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
See AMHA's FY22 MTW Supplement for a full description of this activity. All safe harbor requirements are being met. This activity has been approved by HUD and has been implemented by AMHA.

AMHA will no longer require a third party to conduct rent reasonableness tests at PBV properties that AMHA owns, manages, or controls. AMHA will follow the rent reasonableness process used for all other properties and conduct the test using Market Vision Partners' Rentellect online system. These tests will be subject to AMHA's voucher program quality control processes. At the Department's request, AMHA must obtain the services of a third-party entity to determine rent reasonableness for PHA-owned units. Requiring approval from a 3rd party may increase costs and creates potential delays in the availability of needed housing units, while adding no measurable value to the process. Conducting these rent reasonableness tests in house will achieve greater cost-effectiveness in federal expenditures, improve administrative efficiencies, eliminate confusion for participants, and improve the response time for conducting rent reasonableness analyses. This waiver contributes to AMHA's larger initiative of promoting project-based voucher efficiency by no longer requiring third parties to conduct rent reasonableness tests and inspections for PBV properties that AMHA has an interest in.

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.
AMHA has not made any changes during implementation. In 2025, AMHA conducted 26 rent reasonableness tests on PBV properties that AMHA owns, manages, or controls. Since these tests were done by AMHA staff rather than sending to a third party, they resulted in reasonable rents and a quicker processing time for the property, AMHA staff, and the household, achieving greater cost effectiveness in federal expenditures.

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

No

Please explain or upload a description of the quality assurance method.
The Owner Services Supervisor, or their designee, audits each rent reasonableness test for accuracy in address, requested rent, utilities, and effective date. The Supervisor and HCVP Manager review the Market Vision Partners online system for accuracy as needed. This quality assurance method is available to anyone who would request it.

No document is attached.

Please explain or upload a description of the rent reasonableness determination method.
See AMHA's FY22 MTW Supplement for a full description of this activity's rent reasonableness determination method.

Market Vision Partners (rent reasonableness online system) maintains an automated database, which includes data on unassisted units for use by staff in making rent reasonableness determinations. The data is updated on an ongoing basis and purged when it is more than 48 months old. The online system uses multiple regression statistics to determine the reasonable rent. Reasonable rents are those determined to be comparable to a fair/high unit with consideration of the following features: size (number of qualifying bedrooms), location, unit type, and utilities. Exception calculations are permitted for units constructed in 2002 or later and for multi-family buildings that provide health and safety features.

No document is attached.

3.a. - Alternative Reexamination Schedule for Households (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

--Interim Increases in Income:
See AMHA's FY25 MTW Supplement for a full description of this activity. All safe harbor requirements are being met. This activity has been approved by HUD. AMHA is waiting to implement this change until HOTMA changes to interim policies are enacted.
AMHA will not perform interim reexaminations for increases in both earned and unearned income, including those that exceed the 10% increase in annual adjusted income, or some other amount established by HUD through notice, except when: 1.) the household was at zero income and is now reporting income, or 2.) a new member with income has been added to the household. This waiver will impact all household types in the HCV and LIPH programs, except for those participating in the tiered rent program as that group does not have the option of a traditional interim reexamination.
AMHA’s goal for this activity is to simplify the rent calculation process, lessen the administrative burden for staff and participants, achieve greater cost effectiveness in federal expenditures, and encourage self-sufficiency among program participants. As part of AMHA’s larger rent reform initiative, this activity will contribute to a reduction in AMHA staff time spent on the certification process through triennial recertifications, simplifying deductions, determining rent using income tiers, utilizing local methods for verification processes, and allowing self-certification of assets and certain deductions. It will also encourage self-sufficiency by giving an incentive for households to attain additional income without an immediate increase in rent, following in line with the tiered rent demonstration and AMHA’s waiver for triennial recertifications for elderly and disabled households.
An impact analysis and hardship policy were included with AMHA’s FY25 Supplement.

--Elderly/Disabled Households Triennial Reexaminations:
See AMHA's FY23 MTW Supplement for a full description of this activity. All safe harbor requirements are being met. HUD has approved this activity. AMHA began this activity with 7/1/24 annual/triennial certifications.
If a household meets the following criteria, it will be enrolled in triennial reexaminations.
• the head of household, co-head, and/or spouse is elderly or disabled,
• the only current income in the household is fixed income (e.g., social security, pension),
• there are no minors in the household,
• there are no permissive deductions,
• not a current FSS participant, and
• does not reside in Edgewood public housing.
For these households, the standard rent calculation method will be used. If a household’s income increases in between triennial reexaminations, the household’s total tenant payment (TTP) will not increase. The households may continue to request interim reexaminations due to a decrease in income. This waiver does not supersede the requirements of PIH Notice 2017-23 requiring a flat rent annual update, so flat rent households will fall under those requirements, not this waiver's. An impact analysis and full hardship policy were included with the FY23 Supplement.
AMHA’s goals for utilizing triennial recertifications are to reduce cost and achieve greater cost effectiveness in federal expenditures while also encouraging participant self-sufficiency. Expanding to elderly and disabled households builds upon the efficiencies gained through triennial recertifications for the Tiered Rent Demonstration. As part of AMHA’s larger rent reform initiative, this activity will contribute to a reduction in AMHA staff time spent on the certification process for participants through triennial recertifications, standardizing medical deductions, and utilizing local methods for verification processes.

--Tiered Rent Demonstration Triennial Reexaminations:
See FY22 MTW Supplement for a full description and approved safe harbor.
AMHA began this activity with 7/1/23 certifications as part of the Rent Reform Demonstration (RRD). The RRD enrollment period for current households was 3/1/23-2/29/24 and for new admissions was 7/1/23-6/30/24. After the enrollment period, AMHA enrolled all eligible new admissions into tiered rent for one year (7/1/24-6/30/25). Beginning 7/1/25, AMHA is no longer enrolling additional households.
Each household’s tiered rent will apply for three years. During that period, their TTP will not increase and they will keep any increases in income, rather than having to put it toward rent. After three years, each household will have a triennial

reexamination and be placed in the tier that matches their total annual gross income in the prior 12 months. Between triennial reexaminations, there will be no interim reexaminations, but rather hardship rents, which will temporarily change a household’s rent if approved. An impact analysis was submitted with the April 2022 Supplement.

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

Cost effectiveness; Self-sufficiency

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

Decreased revenue; 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 only to a subset or subsets of assisted households

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

--Interims for Increase in Income:

All households except for those on tiered rent.

--Elderly/Disabled Households Triennial Reexaminations:

If a household meets the following criteria:

the head of household, co-head, and/or spouse is elderly or disabled,

the only current income in the household is fixed income (e.g., social security, pension),

there are no minors in the household,

there are no permissive deductions,

not a current FSS participant, and

does not reside in Edgewood public housing.

--Tiered Rent Demonstration Triennial Reexaminations:

Non-elderly, non-disabled households currently or newly receiving an HCV or PH subsidy at the time of random assignment. The following households are excluded:

-Head, Co-Head, Spouse aged 56 or older

-Households in the homeownership program

-Current FSS participants

-PH flat rent households

-HCV 0 HAP households

-Special purpose vouchers: VASH, Mod Rehab (Certificate), Enhanced Voucher, Shelter Plus Care, Family Unification Program, Foster Youth, Emergency Housing Voucher, Mainstream, Tenant Protection Voucher

-Mixed eligibility families

-Households living in Jobs Plus developments

-Households receiving Earned Income Disregard (EID) at RA

-Households living in developments that underwent a PBRA RAD conversion (not excluded if PBV conversion)

-Households in phase-in period under RAD protections

-Port-outs

-Households who are not yet indicated as disabled according to HUD definition, but: Have been approved to receive SSI/SSDI but have not yet received first payment, or have a pending SSI/SSDI application in (applied recently and waiting to learn of approval status)

Does the MTW activity apply to all public housing developments?

The MTW activity applies to specific developments

Which developments participate in the MTW activity?

--Interims for Increase in Income:

All developments.

--Elderly/Disabled Triennial Reexaminations:

Applies to all public housing developments except for Edgewood, OH007000047.

--Tiered Rent Demonstration Triennial Reexaminations:

OH007000003 Mohawk

OH007000008 Scattered Sites

OH007000014 Joy Park

OH007000015 Van Buren

OH007000024 Bon Sue

OH007000025 Valley View

OH007000029 Honey Locust Garden

OH007000030 Colonial Hills

OH007000034 Pinewood Gardens

OH007000039 Willow Run

OH007000040 Crimson Terrace

OH007000041 Maplewood Gardens

Not listed specifically because they don’t have their own numbers in PIC: Barberton Scattered Sites (Crimson), Harding Rd

(Crimson), Jenkins Annex (Willow Run), Lobello Lane (Honey Locust), Maplewood Villa (Maplewood Gardens)

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.
--Interim Reporting Policy:
Not yet implemented, waiting for HOTMA.

--Elderly/Disabled Triennial Reexaminations:
AMHA began this activity with 7/1/24 certifications. No additional changes have been made. As of 7/1/25, AMHA has placed approximately 3,200 HCV and LIPH households onto the Elderly/Disabled Triennial Reexamination schedule. Since implementing this waiver, AMHA has seen reduced administrative time by processing fewer annual reexaminations each month.

--Tiered Rent Demonstration Triennial Reexaminations:
AMHA began this activity along with the other Rent Reform Demonstration waivers (elimination of deductions and tiered

rent) with 7/1/23 certifications. The Rent Reform Demonstration enrollment period for current households was 3/1/23-2/29/24 and for new admission households was 7/1/23-6/30/24. In total, 3,667 households (HCV and LIPH) went through the Rent Reform Demonstration enrollment appointment and were randomly assigned to standard rent or tiered rent.

Due to the tiered rent program, which includes triennial reexaminations, AMHA has saved administrative time by no longer processing annual reexaminations for these households. AMHA estimates a reduction in processing annual reexaminations for approximately 2,050 households across the HCV and LIPH programs for the two years in-between their

tiered rent triennial reexaminations.

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?

Provided Already

What is the recertification schedule?

Once every three years

How many interim recertifications per year may a household request?

2 or more

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

--Interim Increases in Income:
AMHA will not perform interim reexaminations for increases in both earned and unearned income, including those that exceed the 10% increase in annual adjusted income, or some other amount established by HUD through notice, except when: 1.) the household was at zero income and is now reporting income, or 2.) a new member with income has been added to the household. This waiver will impact all household types in the HCV and LIPH programs, except for those participating in the tiered rent program as that group does not have the option of a traditional interim reexamination. An impact analysis and full hardship policy were submitted with AMHA’s FY25 Supplement.

--Elderly/Disabled Triennial Reexaminations:
If a household’s income increases in between triennial reexaminations, the household’s total tenant payment (TTP) will not increase. The households may continue to request interim reexaminations due to a decrease in income. There will be no limit to the number of interim reexaminations allowed to be requested. If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship. An impact analysis and full hardship policy were submitted with AMHA’s FY23 Supplement.

--Tiered Rent Demonstration Triennial Reexaminations:
AMHA's previous request for triennial reexaminations as part of the Tiered Rent Demonstration does not allow for any interim recertifications, but households may request temporary hardships lasting 6-12 months. See AMHA's FY22 MTW Supplement for a full description of this hardship policy.

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

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

--Interim Increases in Income:
See AMHA's FY25 MTW Supplement for a full description of this activity. All safe harbor requirements are being met. This activity has been approved by HUD. AMHA is waiting to implement this change until HOTMA changes to interim policies are enacted.
AMHA will not perform interim reexaminations for increases in both earned and unearned income, including those that exceed the 10% increase in annual adjusted income, or some other amount established by HUD through notice, except when: 1.) the household was at zero income and is now reporting income, or 2.) a new member with income has been added to the household. This waiver will impact all household types in the HCV and LIPH programs, except for those participating in the tiered rent program as that group does not have the option of a traditional interim reexamination.
AMHA’s goal for this activity is to simplify the rent calculation process, lessen the administrative burden for staff and participants, achieve greater cost effectiveness in federal expenditures, and encourage self-sufficiency among program participants. As part of AMHA’s larger rent reform initiative, this activity will contribute to a reduction in AMHA staff time spent on the certification process through triennial recertifications, simplifying deductions, determining rent using income tiers, utilizing local methods for verification processes, and allowing self-certification of assets and certain deductions. It will also encourage self-sufficiency by giving an incentive for households to attain additional income without an immediate increase in rent, following in line with the tiered rent demonstration and AMHA’s waiver for triennial recertifications for elderly and disabled households.
An impact analysis and hardship policy were included with AMHA’s FY25 Supplement.

--Elderly/Disabled Households Triennial Reexaminations:
See AMHA's FY23 MTW Supplement for a full description of this activity. All safe harbor requirements are being met. HUD has approved this activity. AMHA began this activity with 7/1/24 annual/triennial certifications.
If a household meets the following criteria, it will be enrolled in triennial reexaminations.
- the head of household, co-head, and/or spouse is elderly or disabled,
- the only current income in the household is fixed income (e.g., social security, pension),
- there are no minors in the household,
- there are no permissive deductions,
- not a current FSS participant, and
- does not reside in Edgewood public housing.

For these households, the standard rent calculation method will be used. If a household’s income increases in between triennial reexaminations, the household’s total tenant payment (TTP) will not increase. While TTP will not increase, the household’s rent may increase if their unit’s contract rent is above their payment standard. The households may continue to request interim reexaminations due to a decrease in income. An impact analysis and full hardship policy were included with the FY23 Supplement.
AMHA’s goals for utilizing triennial recertifications are to reduce cost and achieve greater cost effectiveness in federal expenditures while also encouraging participant self-sufficiency. Expanding to elderly and disabled households builds upon the efficiencies gained through triennial recertifications for the Tiered Rent Demonstration. As part of AMHA’s larger rent reform initiative, this activity will contribute to a reduction in AMHA staff time spent on the certification process for participants through triennial recertifications, standardizing medical deductions, and utilizing local methods for verification processes.
--Tiered Rent Demonstration Triennial Reexaminations:
See FY22 MTW Supplement for a full description and approved safe harbor.
AMHA began this activity with 7/1/23 certifications as part of the Rent Reform Demonstration (RRD). The RRD enrollment period for current households was 3/1/23-2/29/24 and for new admissions was 7/1/23-6/30/24. After the enrollment period, AMHA enrolled all eligible new admissions into tiered rent for one year (7/1/24-6/30/25). Beginning 7/1/25, AMHA is no longer enrolling additional households.
Each household’s tiered rent will apply for three years. During that period, their TTP will not increase and they will keep any increases in income, rather than having to put it toward rent. After three years, each household will have a triennial reexamination and be placed in the tier that matches their total annual gross income in the prior 12 months. Between triennial reexaminations, there will be no interim reexaminations, but rather hardship rents, which will temporarily change a household’s rent if approved. An impact analysis was submitted with the April 2022 Supplement.

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

Cost effectiveness; Self-sufficiency

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

Decreased revenue; 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 only to a subset or subsets of assisted households

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

--Interims for Increase in Income:

All households except for those on tiered rent.

--Elderly/Disabled Households Triennial Reexaminations:

If a household meets the following criteria:

the head of household, co-head, and/or spouse is elderly or disabled,

the only current income in the household is fixed income (e.g., social security, pension),

there are no minors in the household,

there are no permissive deductions,

not a current FSS participant, and

does not reside in Edgewood public housing.

--Tiered Rent Demonstration Triennial Reexaminations:

Non-elderly, non-disabled households currently or newly receiving an HCV or PH subsidy at the time of random assignment. The following households are excluded:

-Head, Co-Head, Spouse aged 56 or older

-Households in the homeownership program

-Current FSS participants

-PH flat rent households

-HCV 0 HAP households

-Special purpose vouchers: VASH, Mod Rehab (Certificate), Enhanced Voucher, Shelter Plus Care, Family Unification Program, Foster Youth, Emergency Housing Voucher, Mainstream, Tenant Protection Voucher

-Mixed eligibility families

-Households living in Jobs Plus developments

-Households receiving Earned Income Disregard (EID) at RA

-Households living in developments that underwent a PBRA RAD conversion (not excluded if PBV conversion)

-Households in phase-in period under RAD protections

-Port-outs

-Households who are not yet indicated as disabled according to HUD definition, but: Have been approved to receive SSI/SSDI but have not yet received first payment, or have a pending SSI/SSDI application in (applied recently and waiting to learn of approval status)

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

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

This activity applies to all tenant-based units and properties with project-based vouchers.

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.

--Interim Reporting Policy:
Not yet implemented, waiting for HOTMA.

--Elderly/Disabled Triennial Reexaminations:
AMHA began this activity with 7/1/24 certifications. No additional changes have been made. As of 7/1/25, AMHA has

placed approximately 3,200 HCV and LIPH households onto the Elderly/Disabled Triennial Reexamination schedule. Since implementing this waiver, AMHA has seen reduced administrative time by processing fewer annual reexaminations each month.

--Tiered Rent Demonstration Triennial Reexaminations:
AMHA began this activity along with the other Rent Reform Demonstration waivers (elimination of deductions and tiered rent) with 7/1/23 certifications. The Rent Reform Demonstration enrollment period for current households was 3/1/23-2/29/24 and for new admission households was 7/1/23-6/30/24. In total, 3,667 households (HCV and LIPH) went through the Rent Reform Demonstration enrollment appointment and were randomly assigned to standard rent or tiered rent.

Due to the tiered rent program, which includes triennial reexaminations, AMHA has saved administrative time by no longer processing annual reexaminations for these households. AMHA estimates a reduction in processing annual reexaminations for approximately 2,050 households across the HCV and LIPH programs for the two years in-between their

tiered rent triennial reexaminations.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Provided Already

What is the recertification schedule?

Once every three years

How many interim recertifications per year may a household request?

2 or more

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

--Interim Increases in Income:
AMHA will not perform interim reexaminations for increases in both earned and unearned income, including those that exceed the 10% increase in annual adjusted income, or some other amount established by HUD through notice, except when: 1.) the household was at zero income and is now reporting income, or 2.) a new member with income has been added to the household. This waiver will impact all household types in the HCV and LIPH programs, except for those participating in the tiered rent program as that group does not have the option of a traditional interim reexamination. An impact analysis and full hardship policy were submitted with AMHA’s FY25 Supplement.

--Elderly/Disabled Triennial Reexaminations:
If a household’s income increases in between triennial reexaminations, the household’s total tenant payment (TTP) will not increase. While TTP will not increase, the household’s rent may increase if their unit’s contract rent is above their payment standard. The households may continue to request interim reexaminations due to a decrease in income. There will be no limit to the number of interim reexaminations allowed to be requested. If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship. An impact analysis and full hardship policy were submitted with AMHA’s FY23 Supplement.

--Tiered Rent Demonstration Triennial Reexaminations:
AMHA's previous request for triennial reexaminations as part of the Tiered Rent Demonstration does not allow for any interim recertifications, but households may request temporary hardships lasting 6-12 months. See AMHA's FY22 MTW Supplement for a full description of this hardship policy.

3.c. - Self-Certification of Assets (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

See AMHA's FY22 MTW Supplement for a full description of this activity. HUD has approved this activity and AMHA has implemented it. HUD approved the self-certification of assets up to $50,000 for current households as of 7/1/22 and approved the safe harbor to apply it to applicant households as of 12/1/22. All other safe harbor requirements are being met. In FY26, AMHA updated this policy to $50,000 or other HUD approved inflation amount. By adjusting the threshold for self-certification, AMHA will continue to align with HUD’s amounts and update for continuing inflation.

This waiver will improve cost effectiveness in AMHA’s effort to reduce administrative burden while still maintaining the integrity of the rent calculation process. This waiver contributes to our larger rent reform initiative, which seeks to achieve greater efficiency and remove administrative barriers.

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.

AMHA staff have been able to spend less time verifying current household and applicant assets. The time savings equates to a shortened time until a unit or voucher is offered to an applicant, providing better customer service and faster housing choice. It also means that staff can more quickly process reexaminations. The administrative time saved has been used to implement AMHA’s other waivers, such as the Rent Reform Demonstration waivers. Compared to the baseline period before the asset self-certification waiver (7/1/22), in April 2026, AMHA counted income from assets for 75% fewer households, but the reported amount of income from assets has increased and so AMHA has not had to pay additional subsidies despite no longer verifying assets under $50,000.

In FY26, AMHA updated this policy to $50,000 or other HUD approved inflation amount.

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

No

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

$50,000.

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

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

See AMHA's FY22 MTW Supplement for a full description of this activity. HUD has approved this activity and AMHA has implemented it. HUD approved the self-certification of assets up to $50,000 for current households as of 7/1/22 and approved the safe harbor to apply it to applicant households as of 12/1/22. All other safe harbor requirements are being met. In FY26, AMHA updated this policy to $50,000 or other HUD approved inflation amount. By adjusting the threshold for self-certification, AMHA will continue to align with HUD’s amounts and update for continuing inflation.

This waiver will improve cost effectiveness in AMHA's effort to reduce administrative burden while still maintaining the integrity of the rent calculation process. This waiver contributes to our larger rent reform initiative, which seeks to achieve greater efficiency and remove administrative barriers.

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.
AMHA staff have been able to spend less time verifying current household and applicant assets. The time savings equates to a shortened time until a unit or voucher is offered to an applicant, providing better customer service and faster housing choice. It also means that staff can more quickly process reexaminations. The administrative time saved has been used to implement AMHA's other waivers, such as the Rent Reform Demonstration waivers. Compared to the baseline period before the asset self-certification waiver (7/1/22), in April 2026, AMHA counted income from assets for 75% fewer households, but the reported amount of income from assets has increased and so AMHA has not had to pay additional subsidies despite no longer verifying assets under $50,000.

In FY26, AMHA updated this policy to $50,000 or other HUD approved inflation amount.

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

No

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

$50,000.

4.a. - Vacancy Loss (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
This waiver is based on funding availability.

Approved for FY2022 – Vacancy Loss in Zip Codes of Opportunity, FY2024 -extended to Extenuating Circumstances

See AMHA's FY22 and FY24 MTW Supplements for a full description of this activity. All safe harbor requirements are being met. This activity has been approved by HUD and was implemented by AMHA on 1/1/23 and extended to extenuating circumstances on 1/1/24.

AMHA will offer vacancy loss payments to landlords in AMHA determined zip codes of opportunity that re-lease a unit to a voucher holder after a previous voucher holder has vacated the unit. Owners with units in all zip codes may request a vacancy loss payment for extenuating circumstances. Qualifying circumstances include a deceased tenant with no remaining household member to assume the lease or a move out due to a VAWA situation (Violence Against Women Act). The payment amount will be no more than one month's contract rent of the previous tenant. The landlord must re-lease the unit to a new voucher holder within 3 months of the AMHA recorded move-out date of the previous tenant and will be paid when the new HAP contract is executed between the owner and AMHA. The goal of this activity is to incentivize landlords to continue their participation in the HCV program and to maintain the availability of units in zip codes of opportunity. The vacancy loss payments are part of a larger landlord incentives initiative to increase the supply of affordable housing,

maintain quality landlords and units, and increase housing options in areas of opportunity.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies only to a subset or subsets of assisted households

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

New admissions and currently assisted households

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

The MTW activity applies to all family types

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

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.
--Extenuating Circumstances:
This activity will apply to all tenant-based units and properties with project-based vouchers.

--Zip Codes of Opportunity:
This activity will apply to units in zip codes of opportunity based on AMHA's SAFMRs. AMHA staff review these areas

annually.

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.
As of 7/1/2026, landlords have made six vacancy loss payment requests. Two requests were approved, two were denied because the landlord had not yet re-leased the unit, one was denied for not timely notifying AMHA of the previous tenant's move out, and one was denied for not timely submitting the request. The denied landlords were instructed to request the vacancy loss payment after they had re-leased the unit if they were still eligible and for those with timeliness concerns, additional landlord education was provided. AMHA is continuing to promote this incentive and educate its landlords.

AMHA has incorporated its SAFMRs into determining the zip codes of opportunity.

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?

Certain types of units only

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

No more than one month's contract rent of the previous tenant.

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
–New Landlords in High Cost Areas Incentive:
See AMHA’s FY26 MTW Supplement for a full description of this activity. This waiver has been approved by HUD and is undergoing implementation. All safe harbor requirements are being met.

This waiver is based on funding availability.

To encourage new landlords to join the HCV program, AMHA will provide a one-time incentive payment to new landlords in high cost areas, as determined by AMHA’s SAFMRs. Payments will be no more than one month of contract rent and will be paid when the HAP contract is executed. The new landlord must complete a request for the incentive within 60 days of the new contract date.

AMHA’s goal for this activity is recruit new landlords, expand the supply of affordable housing, and offering additional housing choices to HCV participants in high cost areas. The new landlord incentive is part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity.

--Landlord Referral Incentive:
See AMHA's FY24 MTW Supplement for a full description of this activity. All safe harbor requirements are being met. HUD has approved this activity and AMHA began implementing it in August 2025.

This waiver is based on funding availability.

In order to incentivize new landlords to join the HCV program, AMHA will provide an incentive payment for landlord referrals. When a current landlord refers a new landlord who executes a HAP contract with AMHA, both the current landlord and the new landlord may receive an incentive payment with their next HAP payment (on or after the HAP contract execution for the new landlord). Payments will be no more than one month of contract rent. The new landlord must complete a request for the incentive within 60 days of the new contract date. Referral incentive payments will be limited to 2 payments per calendar year per landlord.

AMHA’s goal for this activity is to build on current landlords’ positive experiences, knowledge, and networks through referral incentives. The referral incentive encourages new landlords to join the HCV program, but also rewards the long-term landlords for remaining with the program and sharing about HCV. The referral incentives are part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of opportunity.

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

Housing choice

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

Increased expenditures

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

assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.
–New Landlords in High Cost Areas Incentive:
Not yet implemented.

--Landlord Referral Incentive:
AMHA has not yet received any landlord referral payment requests. AMHA is discussing marketing strategies while also

reviewing changing funding levels to ensure financial capacity.

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?

Certain types of units only

What is the maximum payment that can be made to a landlord under this policy?
–New Landlords in High Cost Areas Incentive:
$500.

--Landlord Referral Incentive:
Current landlords that are referring a new landlord = $200.

For the new landlord being referred = $100.

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 waiver is based on funding availability.

Previously approved for FY22, extended to accessible units in FY24, extended to previously passed inspections in FY26. See AMHA's FY22, FY24, and FY26 MTW Supplements for a full description of this activity. All safe harbor requirements are being met. This activity has been approved by HUD and has been implemented by AMHA.

AMHA will offer pre-qualifying inspections for units in AMHA determined zip codes of opportunity, for units in any zip code with accessibility features for persons with motor/mobility, auditory, or visual impairments, and in cases where an inspection has passed during the regular RFTA process, but the requesting tenant never moves in. To be used in lieu of a move-in inspection, the pre-inspection must have passed within 90 days of the AMHA approved move in date. Participants will be able to request an interim inspection after move in as needed. The goal of these inspections is to lessen the time it takes for a voucher holder to move into a unit and encourage participation from new landlords in zip codes of opportunity by offering additional customer service. The pre-qualifying unit inspections are part of a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options in areas of

opportunity.

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 only to a subset or subsets of assisted households

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

New admissions and currently assisted households

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

The MTW activity applies to all family types

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

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

This activity will apply to units with accessibility features for persons with motor/mobility, auditory, or visual impairments, to units in zip codes of opportunity as determined by AMHA's SAFMRs, and in cases where an inspection has passed during

the regular RFTA process, but the requesting tenant never moves in.

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.

FY 2023:
Requests: 16
Approved to be conducted: 1
Passed Inspection: 1

FY 2024:
Requests: 29
Approved to be conducted: 16
Passed Inspection: 6

FY 2025:
Requests: 47
Approved to be conducted: 24
Passed Inspection: 10

Some of the requests did not meet AMHA's requirements. AMHA staff reached out to the ineligible landlords to explain the process and connect them with other landlord resources. For the landlords that were eligible for the inspection, but their unit did not pass, they received information on fail items so they could be corrected before finding a voucher holder tenant. In all cases, the landlord education and pre-inspection will reduce the time needed to complete the inspection cycle after an RFTA has been submitted and has increased the communication between landlords and AMHA staff to continue to

build positive relationships.

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

No

How long is the pre-inspection valid for?

The pre-inspection is valid for 90 days.

5.c. - Third-Party Requirement (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

See AMHA's FY22 MTW Supplement for a full description of this activity. All safe harbor requirements are being met. This activity has been approved by HUD and was implemented on 7/1/2022.

AMHA will no longer require a third party to conduct inspections at PBV properties that AMHA has an interest in. AMHA will follow the inspection process utilizing the current HUD inspection method that is used for all other HCV properties. The inspections will be subject to AMHA’s voucher program quality control processes. Participants will also be able to request an interim inspection at any time if they feel an inspection need was not met. Conducting these inspections in house will achieve greater cost-effectiveness in federal expenditures, improve administrative efficiencies, eliminate confusion for participants, and improve the response time for conducting inspections. This waiver contributes to our larger initiative of promoting project-based voucher efficiency by no longer requiring third parties to conduct rent reasonableness tests and

inspections for PBV properties that AMHA has an interest in.

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.

Nothing has changed during implementation. Since implementation, AMHA has not had to pay a third party contractor for any PBV inspections at units AMHA owns or has an interest in. In comparison, during FY22, a third party contractor conducted 48 PBV inspections for AMHA. This waiver has resulted in approximately $2,000 in cost savings annually for

AMHA and a better continuity of service for our households.

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

No

Please explain or upload the description of the quality assurance method:

Following will explain the quality assurance method
The Quality Control Inspector selects recently completed inspections drawn from the three months preceding the re-inspection that represent a cross section of neighborhoods and the work of a cross section of inspectors. The number of inspection expected to have a quality control re-inspection is calculated as follows: if number of units is over 2,000, the

number of inspections to be selected is 30 plus one for each 200 (or part of 200) over 2,000.

No document is attached.

9.b. - Increase PBV Project Cap (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative See AMHA's FY26 MTW Supplement for a full description of this activity. All safe harbor requirements are being met. This activity has been approved by HUD and will be utilized when needed. AMHA will raise the project cap for any project that AMHA owns, manages, or has an interest in so that 100% of the project can receive project-based vouchers. AMHA is subject to PIH Notice 2013-27 where applicable, or successor. AMHA's goal for this activity is to increase the supply of affordable housing. Allowing 100% of a project to receive project-based vouchers creates a sustainable funding stream for any property to develop and maintain a quality level of housing. AMHA households will also have additional housing choices through these project-based vouchers because the contract guarantees the property will accept their voucher assistance and will do so for the long-term. Increasing the caps in lower poverty areas can create affordable units in desirable locations. This waiver contributes to AMHA's project-based voucher reform that intends to increase housing choice and reduce administrative burden through conducting our own inspections and rent reasonableness tests, offering project-based vouchers for shared housing units, and eliminating the selection process for properties AMHA has an interest in.
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
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. No changes have been made to this activity and AMHA has not utilized this waiver to date.
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 See AMHA's FY26 MTW Supplement for a full description of this activity. All safe harbor requirements are being met. This activity has been approved by HUD and will be utilized when needed. AMHA will eliminate the selection process in the award of PBVs to properties that AMHA has an interest in that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site. A subsidy layering review must be conducted. AMHA will complete site selection requirements and AMHA will follow the inspection process utilizing the current HUD inspection method that AMHA uses for all other PBV properties. The property must be owned by a single-asset entity of AMHA and AMHA is subject to PIH Notice 2013-27 where applicable. The goal of this activity is to reduce the administrative burden of the PBV selection process and the expenditure required to improve, develop, or replace public housing units. The selection process is time-consuming and labor-intensive for PHAs. Staff would have more time to focus on other priorities. It also accelerates the process to award PBVs. Many public

housing properties have already undergone renovation and so would not need further improvement before applying project-based vouchers to the site. This waiver contributes to AMHA’s project-based voucher reform that intends to increase housing choice and reduce administrative burden through conducting our own inspections and rent reasonableness tests, offering project-based vouchers for shared housing units, and increasing the project-based voucher cap for properties AMHA has an interest in.

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.

No changes have been made to this activity and AMHA has not utilized this waiver to date.

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

No

9.e. - Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (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

See AMHA's FY24 MTW Supplement for a full description of this activity. This activity has been approved by HUD and was implemented by AMHA on 2/1/2024.

All safe harbor requirements are being met. AMHA will allow the use of project-based vouchers (PBVs) for shared housing. The shared housing units may not be owner occupied. AMHA will follow the inspection process utilizing the current HUD inspection method that AMHA uses for all other PBV properties. The PBV units must comply with deconcentration and desegregation requirements under 24 CFR part 903. A subsidy layering review must be conducted. Offering PBVs for shared housing will increase the local housing choices available to AMHA’s households. This waiver contributes to our larger project-based voucher reform that includes streamlining inspections and rent reasonableness tests.

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.

AMHA allowed shared housing as an option with its Project-Based Voucher Request for Proposals issued in February

2024. At this time, no shared housing projects have been submitted for review. No changes have been made during implementation.

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

No

How many shared housing units does the MTW agency anticipate assisting in the Fiscal Year?

0

How many shared housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?

0

How many manufactured housing units does the MTW agency anticipate assisting in the Fiscal Year?

0

How many manufactured housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?

0

9.h. - Limit Portability for PBV Units (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

AMHA will provide a tenant-based voucher to a project-based voucher household after 24 months when requested by the project-based household.

The goal of this activity is to achieve greater cost effectiveness through fewer project-based voucher turnovers. This change will decrease time spent issuing vouchers to move and qualifying additional applicants to fill vacant units. It also supports AMHA's partnership with the project-based voucher owners in our community, maintaining the housing choices our households currently have. This waiver contributes to AMHA's project-based voucher reform that intends to increase housing choice and reduce administrative burden through conducting our own inspections and rent reasonableness tests, offering project-based vouchers for shared housing units, and eliminating the selection process for properties AMHA has an interest in.

All safe harbors requirements are being met for this waiver.

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.

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 only to a subset or subsets of assisted households

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

New admissions and currently assisted households

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

The MTW activity applies to all family types

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

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

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.

New waiver request for FY27.

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

No

10.d.PH - Modify or Eliminate the Contract of Participation (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

See AMHA's FY24 MTW Supplement for a full description of this activity. All safe harbor requirements are being met. This activity has been approved by HUD and was implemented on 1/1/24.

The Family Self-Sufficiency (FSS) Contract of Participation (CoP) will be modified for new FSS program enrollees to a 5-year period, beginning the first day of the month following the family’s enrollment appointment. The modified CoP will also give FSS participants a maximum of 3 years possible extension rather than 2 years. All other changes to the CoP resulting from the FSS Final Rule will remain in the modified CoP.

AMHA’s goal for this change is to simplify the process of determining the FSS contract end date and ensure consistency in the time offered to participants. Both participants and staff will benefit from the consistency of the new model. Allowing for extensions past 2 years will counteract any lost time on the CoP. Clients will be able to sign the CoP at their enrollment appointment, rather than making a separate appointment once their first certification after FSS enrollment is completed. The modifications will lessen the administrative burden for staff and participants, achieve greater cost-effectiveness in federal expenditures, and eliminate confusion for participants.

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.

This activity has successfully provided clarity and consistency for FSS participants and staff and saved administrative time from duplicative appointments. No changes have been made during implementation.

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.d.HCV - Modify or Eliminate the Contract of Participation (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

See AMHA's FY24 MTW Supplement for a full description of this activity. All safe harbor requirements are being met. This activity has been approved by HUD and was implemented on 1/1/24.

The Family Self-Sufficiency (FSS) Contract of Participation (CoP) will be modified for new FSS program enrollees to a 5-year period, beginning the first day of the month following the family’s enrollment appointment. The modified CoP will also give FSS participants a maximum of 3 years possible extension rather than 2 years. All other changes to the CoP resulting from the FSS Final Rule will remain in the modified CoP.

AMHA’s goal for this change is to simplify the process of determining the FSS contract end date and ensure consistency in the time offered to participants. Both participants and staff will benefit from the consistency of the new model. Allowing for extensions past 2 years will counteract any lost time on the CoP. Clients will be able to sign the CoP at their enrollment appointment, rather than making a separate appointment once their first certification after FSS enrollment is completed. The modifications will lessen the administrative burden for staff and participants, achieve greater cost-effectiveness in federal expenditures, and eliminate confusion for participants.

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.

This activity has successfully provided clarity and consistency for FSS participants and staff and saved administrative time from duplicative appointments. No changes have been made during implementation.

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.

13. - How many months will households be able to remain in a unit while over income? (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

See AMHA's FY24 MTW Supplement for a full description of this activity. All safe harbor requirements are being met. This activity has been approved by HUD and was implemented on 1/1/24.

AMHA will extend the period that a public housing household can be over-income while remaining in public housing with its subsidy to 3 years. The over-income limit will continue to be set at 120% of Area Median Income (AMI). AMHA will terminate the household’s tenancy six months after the end of the grace period.

The goal of this activity is to be an incentive for the economic progress and the eventual self-sufficiency of the household. If the household is able to remain in their subsidized unit for a longer period paying an affordable rent, they have the opportunity to become more financially stable before exiting the program. This activity also serves to reduce cost and achieve greater cost effectiveness in federal expenditures because the public housing unit will remain leased for a longer

period of time, decreasing the turnover and administrative time and cost required to re-lease the unit.

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

Cost effectiveness; Self-sufficiency

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

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.

AMHA has been able to utilize the longer grace period to support households on their way to self-sufficiency. With this extension, AMHA has not had to terminate any public housing households for being over income. No changes have been

made during implementation.

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

No

How many months will households be able to remain in a unit while over income?

36

17.b. - Service Provision

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

--LIPH lease up incentives
See AMHA's FY24 MTW Supplement for a full description. All safe harbor requirements are being met. This activity has been approved and implementation is pending.

AMHA will offer a one-time incentive payment to new admission public housing households that accept:
1. An efficiency unit or
2. A unit that has had 2 or more consecutive rejections

The incentive will be disbursed to the resident within 45 days of their move in date. The incentive will be a direct payment to the household and will not be in the form of a deduction to the household's rent contribution. The amount of the incentive must not equal more than one month of the applicable unit's rent. The goal is to reduce administrative burden and reduce cost while achieving greater cost effectiveness by encouraging applicants to accept available units. This action reduces the vacancy time on the unit and staff time spent preparing another applicant file to re-offer the unit.

--End of Life Care Services
See AMHA's FY24 MTW Supplement for a full description. All safe harbor requirements are being met. This activity has been approved and implementation is pending.

AMHA will competitively bid the option for a third-party provider to provide low-income households with end of life care services. Families receiving services through local, non-traditional activities must meet the HUD definition of low-income. The goal is to provide support to low-income individuals in our community during the end of life. This method will reach more and new families with AMHA's funding than is possible within the traditional housing programs. This activity fits into

AMHA's larger goal of increasing local affordable housing choices to our community.

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 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 only to a subset or subsets of assisted households

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

New admissions (i.e., applicants) only

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

The MTW activity applies to all family types

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

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.
AMHA is currently working on implementation for both the PH Leasing Incentive and the End of Life Care Services. For FY27, AMHA has reviewed the monetary amount for the PH Leasing Incentive and determined to offer up to $400 and will

vary the amount based on bedroom size. There have been no changes to the End of Life Care Services activity.

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

No

What types of services is the MTW agency providing?
--Public Housing Leasing Incentive:
AMHA will offer a one-time incentive payment to new admission public housing households that accept:
1. An efficiency unit, or
2. A unit that has had 2 or more consecutive rejections.

--End of Life Care Services:

AMHA will not provide any services, but will competitively bid the option for a third-party provider to do so.

How many households did the PHA provide services to in the most recently completed PHA Fiscal Year through this activity?

0

Does the MTW activity apply to all LNT units/properties?

Are any families receiving services only (i.e., services only and no housing assistance provided by the PHA)?

Yes

# of persons receiving LNT services only in the most recently completed PHA fiscal year.

0

D.	Safe Harbor Waivers.
D.1	**Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?** Yes, the Safe Harbor Waiver request(s) for 1v, 1w is(are) attached.

E.	Agency-Specific Waiver(s).
E.1	See below

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.

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?
Yes

Title	Supporting Documents Attached
Wrong Size PBV Units	0
Mainstream Residency Preference	0

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

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

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

Title	Has there been a change in how the waiver is being implemented from when it was originally approved?	Please provide a description of what has changed.	Please provide a description of the final outcomes and lessons learned from implementing this Activity at your PHA.	If the MTW Agency was previously required to prepare an impact analysis, was a final impact analysis prepared at the time of discontinuation?
Allow HCVP participants to remain on the program for 12 months with 0 Housing Assistance Payments	No			
Local Verification Method	No			
Remove third party requirement for inspections for tenant-based voucher units AMHA owns, managers, or controls	No			
Remove third party requirement for rent reasonableness tests for tenant-based voucher units AMHA owns, managers, or controls	No			

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
2021	$21,316,610	$21,316,610	$0	2029-09-30
2022	$21,754,331	$21,754,661	$0	2030-09-30
2023	$21,663,585	$21,663,585	$0	2031-09-30
2024	$22,958,843	$22,958,843	$0	2032-09-30
2025	$23,090,613	$23,090,613	$0	2033-09-30

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

Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income	
49%-30% Area Median Income	
Below 30% Area Median Income	
Total Local, Non-Traditional Households	**0**

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

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.	# 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.	# 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*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?

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

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.

I.	Evaluations.

Yes - This table lists evaluations of Akron Metropolitan Housing Authority's MTW activities, including the names of evaluators and available reports

Table I.1 - Evaluations of MTW Policies

Title and short description	Evaluator name and contact information	Time period	Reports available

Stepped and Tiered Rent Demonstration. AMHA's participation in the second cohort of the MTW Expansion will evaluate alternative rent policies designed to increase resident self-sufficiency and reduce PHA administrative burdens. An independent research team lead by MDRC will work with HUD and the selected PHAs to assist in implementation and evaluate the effects of the alternative rent polices.	James Riccio, MDRC James.Riccio@mdrc.org	7/1/2023-6/30/2029	https://www.huduser.gov/portal/publications/Rent-Reforı https://www.huduser.gov/portal/publications/Stepped-Ti

AMHA Tiered Rent Table			
Rent calculated at 28% of midpoint of tier			
Tier	Tier Income Minimum	Tier Income Maximum	Tiered Rent
1	$0	$2,499	$50
2	$2,500	$4,999	$87
3	$5,000	$7,499	$146
4	$7,500	$9,999	$204
5	$10,000	$12,499	$262
6	$12,500	$14,999	$321
7	$15,000	$17,499	$379
8	$17,500	$19,999	$437
9	$20,000	$22,499	$496
10	$22,500	$24,999	$554
11	$25,000	$27,499	$612
12	$27,500	$29,999	$671
13	$30,000	$32,499	$729
14	$32,500	$34,999	$787
15	$35,000	$37,499	$846
16	$37,500	$39,999	$904
17	$40,000	$42,499	$962
18	$42,500	$44,999	$1,021
19	$45,000	$47,499	$1,079
20	$47,500	$49,999	$1,137
21	$50,000	$52,499	$1,196
22	$52,500	$54,999	$1,254
23	$55,000	$57,499	$1,312
24	$57,500	$59,999	$1,371
25	$60,000	$62,499	$1,429
26	$62,500	$64,999	$1,487
27	$65,000	$67,499	$1,546
28	$67,500	$69,999	$1,604
29	$70,000	$72,499	$1,662
30	$72,500	$74,999	$1,721
31	$75,000	$77,499	$1,779
32	$77,500	$79,999	$1,837
33	$80,000	$82,499	$1,896
34	$82,500	$84,999	$1,954

AMHA MTW Hardship Policy

If a requirement or provision of an MTW activity may constitute a financial or other hardship for AMHA households, AMHA will create a hardship policy. AMHA will review its hardship policy(s) with participants/residents during its intake and recertification processes. The agency will also consider if a participant/resident qualifies for a hardship exemption at the time of a potential termination of assistance that is due to an MTW activity. When a participant/resident requests a hardship exemption from a required MTW activity, AMHA will suspend the activity for the household, beginning the next month after the request, until the MTW agency has determined if the request is warranted. Hardship information will be retained by AMHA for the duration of AMHA's participation in the MTW demonstration program and available for public review and inspection.

Hardship Policy: Tiered Rent, Elimination of Deductions, and Triennial Recertifications

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

Automatic Hardships:
These hardships may be granted at the time of the triennial recertification for the following reasons. Automatic hardships will last for 12 months.

1. Current gross income is less than the household's retrospective (prior 12 months) income.
2. Childcare expenses total $2,500 or more annually.*
3. Large family: households with 6 or more dependents will receive a reduction in their gross income of $1,200.*

*Households will not be eligible to receive both a childcare hardship and a large family hardship. If a household is eligible for both hardships, AMHA will select the most beneficial remedy.

Households may apply for additional hardships, which will last either 6 or 12 months depending on the reason for the hardship.

6 Month Hardships:

1. Temporary decrease in income expected to last between 31 days and 6 months (such as unpaid leave, seasonal employment ending, etc.).
2. Other circumstances: A household may request a hardship exemption for other circumstances not outlined in this policy, such as the death of a family member that impacts the family's finances or a significant increase in reasonable and necessary out-of-pocket expenses because of changed circumstances (for example, a large medical bill). AMHA will consider these requests and appropriate remedies on a case-by-case basis and decisions will be made by a staff member at the supervisor level or higher.

12 Month Hardships:

1. Decrease in income: includes loss of employment or other income.
2. Childcare expenses total $2,500 or more annually.*
3. Large family: households with 6 or more dependents will receive a reduction in their gross income of $1,200.*
4. Full-time student status: an adult household member other than the head, co-head, or spouse becomes a full-time student after the effective date of the household's triennial recertification and has earnings that would be excluded under 24 CFR 5.609(c)11.

*Households will not be eligible to receive both a childcare hardship and a large family hardship.

If a household is eligible for both hardships, AMHA will select the most beneficial remedy.

Long Term Hardship:
This hardship will last until the next triennial recertification and will not need to be renewed. Current income will not be reviewed for a long term hardship. Rather, the deceased household member and their income will be removed from the household's record.

1. Death of a household member.

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

The tiered rent hardship request will be denied if the form is not accompanied by documentation of the hardship and/or the request would not move the household's income into a lower tier. In the case of hardship denials, the household will be sent a denial letter stating why they did not qualify.

Prior to the expiration of the tiered rent hardship, the household will be notified of their rent portion set at their last triennial recertification or new admission. Households may request a renewal of their hardship. The request will be treated as a new hardship request and undergo a new determination with current income.

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

If the head of household, spouse, or co-head becomes elderly or disabled, the household is eligible to be excluded from the tiered rent policy and return to the traditional income-based rent policy.

If a household disagrees with their hardship determination, they may use the following grievance procedure:

Request a review, which will be conducted by a staff member at the supervisor level or higher. The household must request a grievance review within and including ten (10) business days of the decision to deny or limit their tiered rent hardship request.

AMHA HARDSHIP POLICY

If a requirement or provision of an MTW activity may constitute a financial or other hardship for AMHA households, AMHA will create a hardship policy. AMHA will review its hardship policy(s) with households during its intake and recertification processes. The agency will also 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. When a household requests a hardship exemption from a required MTW activity, AMHA will suspend the activity for the household, beginning the next month after the request, until the MTW agency has determined if the request is warranted. Hardship information will be retained by AMHA for the duration of AMHA's participation in the MTW demonstration program and available for public review and inspection.

If a household disagrees with their hardship determination, they may use the following grievance procedure:

> Request a review, which will be conducted by a staff member at the supervisor level or higher. The household must request a grievance review within and including ten (10) business days of the decision to deny or limit their tiered rent hardship request.

Hardship Policy: Standardized Medical Deduction and Medical Expense Threshold

Households with unreimbursed medical expenses greater than the standardized medical deduction of $500 may apply for a hardship. If approved, the hardship will provide a deduction equal to the household's total annual unreimbursed medical expenses (minus the approved medical/disability threshold).

Hardships may be requested by the household or they may be automatic at the time of annual or triennial recertification.

To request a hardship, the household must complete the Hardship Request form and attach proof of all unreimbursed medical expenses for the prior 12 months and/or proof of other related hardship. The form will be made available in an accessible format upon request as a reasonable accommodation. The request will be reviewed and the household notified of the approval or denial in a timely manner.

The hardship request will be denied if the form is not accompanied by documentation of the hardship and/or the request would not change the household's rent. In the case of hardship denials, the household will be sent a denial letter stating why they did not qualify.

Approved hardships will last until the household's next annual or triennial reexamination.

If a household is approved for a hardship, and subsequently incurs additional unreimbursed medical expenses while still in hardship status, they may request an additional hardship. The request will be treated as a new hardship request and undergo a new determination with proof of all applicable medical expenses. There is no limit on the number of hardships that a household may receive.

G. HARDSHIP POLICY

If a requirement or provision of an MTW activity may constitute a financial or other hardship for AMHA households, AMHA will create a hardship policy. AMHA will review its hardship policy(s) with households during its intake and recertification processes. The agency will also 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. When a household requests a hardship exemption from a required MTW activity, AMHA will suspend the activity for the household, beginning the next month after the request, until the MTW agency has determined if the request is warranted. Hardship information will be retained by AMHA for the duration of AMHA's participation in the MTW demonstration program and available for public review and inspection.

If a household disagrees with their hardship determination, they may use the following grievance procedure:

> Request a review, which will be conducted by a staff member at the supervisor level or higher. The household must request a grievance review within and including ten (10) business days of the decision to deny or limit their tiered rent hardship request.

Hardship Policy: Asset Self-Certification, Interim Reporting Policy, Financial Aid Exclusion, HUD Passbook Rate, Wrong Size PBV Unit, Mainstream Residency Preference

If a household believes they have a circumstance that qualifies as a financial or other hardship related to this policy, the household must complete the Hardship Request form and attach proof of the hardship. The request will be reviewed and the household notified of the approval or denial in a timely manner. The hardship request will be denied if the form is not accompanied by documentation of the hardship and/or the request would not change the household's rent or eligibility. In the case of hardship denials, the household will be sent a denial letter stating why they did not qualify.

<u>G. HARDSHIP POLICY</u>

If a requirement or provision of an MTW activity may constitute a financial or other hardship for AMHA households, AMHA will create a hardship policy. AMHA will review its hardship policy(s) with households during its intake and recertification processes. The agency will also 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. When a household requests a hardship exemption from a required MTW activity, AMHA will suspend the activity for the household, beginning the next month after the request, until the MTW agency has determined if the request is warranted. Hardship information will be retained by AMHA for the duration of AMHA's participation in the MTW demonstration program and available for public review and inspection.

If a household disagrees with their hardship determination, they may use the following grievance procedure:

> Request a review, which will be conducted by a staff member at the supervisor level or higher. The household must request a grievance review within and including ten (10) business days of the decision to deny or limit their tiered rent hardship request.

<u>Hardship Policy: Payment Standards</u>

If a household has a hardship related to the determination of their payment standard amount as a percentage of the FMR/SAFMR or the timeframe of when their payment standard increase will be effective, they may request a hardship by completing the Hardship Request Form with an explanation and proof of the hardship, as needed. The request will be reviewed and the household notified of the approval or denial in a timely manner. The hardship request will be denied if the form is not accompanied by documentation of the hardship and/or the request would not change the household's payment standard and rent portion. In the case of hardship denials, the household will be sent a denial letter stating why they did not qualify.

AMHA HARDSHIP POLICY

If a requirement or provision of an MTW activity may constitute a financial or other hardship for AMHA households, AMHA will create a hardship policy. AMHA will review its hardship policy(s) with households during its intake and recertification processes. The agency will also 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. When a household requests a hardship exemption from a required MTW activity, AMHA will suspend the activity for the household, beginning the next month after the request, until the MTW agency has determined if the request is warranted. Hardship information will be retained by AMHA for the duration of AMHA's participation in the MTW demonstration program and available for public review and inspection.

If a household disagrees with their hardship determination, they may use the following grievance procedure:

> Request a review, which will be conducted by a staff member at the supervisor level or higher. The household must request a grievance review within and including ten (10) business days of the decision to deny or limit their tiered rent hardship request.

Hardship Policy: Elderly/Disabled Households Triennial Recertifications

Households experiencing a decrease in income may request an interim reexamination. If a household believes they have another circumstance that qualifies as a financial hardship, the household must complete the Hardship Request form and attach proof of the hardship. The request will be reviewed and the household notified of the approval or denial in a timely manner. The hardship request will be denied if the form is not accompanied by documentation of the hardship and/or the request would not change the household's rent. In the case of hardship denials, the household will be sent a denial letter stating why they did not qualify.

<u>MTW Safe Harbor Waiver Requests – Akron Metropolitan Housing Authority OH007</u>

AMHA requests Safe Harbor Waivers for the following MTW activities:

1.v. Alternative Income Inclusions/Exclusions (PH)

1.w. Alternative Income Inclusions/Exclusions (HCV)

1.v. & 1.w. Alternative Income Inclusions/Exclusions

The MTW waiver for the Alternative Income Inclusions/Exclusions states "agency must exempt elderly and disabled individuals from this rent determination policy."

1.v. Alternative Income Inclusions/Exclusions waiver waives certain provisions of section 3(a)(1) and 3(b)(4)-(5) of the 1937 Act and 24 CFR 5.609 and 960.257.

1.w. Alternative Income Inclusions/Exclusions waiver waives certain provisions of sections 3(a)(1), 3(b)(4)-(5) and 8(o)(2)(A)-(C) of the 1937 Act and 24 CFR 5.609 and 982.516.

AMHA is proposing to exclude all student financial aid from income. AMHA is also proposing to discontinue using HUD's asset passbook rate to determine income from assets and instead, only use income from assets determined through verification or self-certification. AMHA plans to apply these income exclusions to elderly and disabled individuals as well as all other households. This waiver will apply to new admissions, portability move ins, interims, and annual reexaminations. A hardship policy will be available to households.

See attached impact analysis and hardship policy addressing waivers 1.v. and 1.w.

Akron Metropolitan Housing Authority
Impact Analysis – 1.v. & 1.w. Alternative Income Inclusions/Exclusions

MTW Activities Covered by Impact Analysis
1.v. Alternative Income Inclusions/Exclusions (PH) 1.w. Alternative Income Inclusions/Exclusions (HCV)
1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)
AMHA anticipates a decrease in expenditures due to decreased staff time spent verifying applicant and participant student financial aid information. With the implementation of HOTMA, PHAs are required to verify financial aid for many more households than in the past. The additional time spent verifying and calculating often results in minimal to no impact on the household's TTP. AMHA estimates that less than 1% of verified financial aid households have any financial aid income counted towards their TTP. AMHA has determined that excluding student financial aid income will result in more than $46,000 saved in administrative costs annually while only resulting in an increase of $2,824 in subsidy annually. Discontinuing the use of HUD's asset passbook rate will save over $400 annually in administrative costs due to auditing asset information and updating housing management software. While this amount is minimal, it will be a time savings that will not impact households' TTP as AMHA will continue to count the income from assets determined through verification or self-certification. AMHA anticipates that these alternative income exclusions will increase the agency's per family contribution by less than $1 (42 cents) annually based on current households that AMHA is counting income from student financial aid or from the asset passbook rate.
2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)
AMHA expects a decrease in housing costs for families due to excluding financial aid and the asset passbook rate as that income will no longer be included in their rent calculation.
3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)
Minimal to no expected impact. While the rate at which a voucher or LIPH unit becomes available will not be impacted by these activities, the time spent processing an application is expected to decrease.
4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)
Minimal to no expected impact. Households may receive fewer termination notices for noncompliance for not submitting required documentation.
5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program
No expected impact.
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice

This MTW activity is expected to assist AMHA in meeting the statutory goal of cost effectiveness by decreasing staff time spent verifying student financial aid and updating HUD's asset passbook rate.
7. Impact on the agency's ability to meet the MTW statutory requirements
No expected impact.
8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity
No expected impact.
9. Across the other factors above, the impact on protected classes (and any associated disparate impact)
AMHA does not expect this activity to have any differential impact on protected classes.

Akron Metropolitan Housing Authority
Agency Specific Waiver – 0 HAP for 12 months

Describe the MTW activity (including what specifically the agency is proposing to waive), the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.
This activity waives certain provisions of 24 CFR 982.455(a), 24 CFR 983.211(a), and 24 CFR 983.258 to extend the length of time a household may stay on the HCV program after the last housing assistance payment (HAP) was made to the owner to 365 days. This activity will impact all household types in the HCV program. This extension of time gives incentives to families with children, and to all participants, to become economically self-sufficient without losing their housing assistance after only 180 days without a HAP payment. The additional time on the HCV program offers the household protection against changes in their income and provides encouragement to the household that they can continue maintaining their current income level after successfully doing so for a full year.
Which of the MTW statutory objectives does this MTW activity serve?
Cost effectiveness. Self-sufficiency.
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.
Decrease expenditures.
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?
This waiver applies to all assisted households.
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?
The waiver applies to both new admissions and currently assisted households.
Does the MTW activity apply to all family types or only to selected family types?
This waiver applies to all family types.
Please select the family types subject to this MTW activity.
All family types.
If Other Selected in Previous Question: Please describe this target population.
n/a
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?
This waiver applies to all HCVP tenant-based and project-based households. It does not apply to the Public Housing program.

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.
This waiver applies to all HCVP tenant-based and project-based 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
Implementation timeline.
AMHA will implement this initiative beginning in July 2022.
Impact analysis.
See separate attachment – OH007FY22ZeroHAPImpact.
Description of a hardship policy, if needed.
This is a self-sufficiency initiative that should not require assisted families to request a hardship exemption. However, families retain their right to request an informal hearing to contest a determination of the family's income, and the use of such income to compute the housing assistance payment, in accordance with the HCVP Administrative Plan.

Akron Metropolitan Housing Authority
Agency Specific Waiver – Local Verification Method

Describe the MTW activity (including what specifically the agency is proposing to waive), the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.
AMHA is proposing a Local Verification Method that waives certain provisions of 24 CFR 982.201(e), 24 CFR 5.233, and PIH Notices 2018-24, 2018-18, 2017-12, and 2006-41. This initiative will impact all household types in the LIPH and HCV program. This method has 4 changes to the current verification method: 1. Extend the time that verifications are valid: for applicants, verifications may not be more than 180 days old at the time of voucher issuance or LIPH move in. For participants, verifications may not be more than 180 days from the certification effective date. 2. In the case of fixed income verifications for both applicants and participants (e.g., Social Security award letters, fixed pensions, etc.), verifications are valid for the full calendar year in which they are effective. For example, a VA award letter stating the 2022 award amount would be valid for any certifications in 2022 rather than re-verifying this stable income amount. 3. Alter the verification hierarchy to the following: Level 1: Up-Front Income Verification (UIV) using HUD's Enterprise Income Verification (EIV) (when it is available to AMHA) Level 2: Upfront Income Verification (UIV) using non-HUD system (when it is available to AMHA) Level 3: Written Third Party Verification OR Written Third Party Verification Form OR Oral Third Party Verification Level 4: Tenant Declaration Clarification of EIV information done by self-certification is considered as Level 1, UIV using HUD's EIV system. For example, if a quarter on the EIV is only partially within the retrospective time period for a tiered rent household, a statement that the income over that quarter was approximately the same would be considered EIV clarification. For all interims, Level 1 (EIV and IVT reports) will not be required, as it will not provide "current" income information for hardship requests or other interim changes, which households will have requested due to recent changes in circumstances. EIV information is generally three to six months behind, so Level 1 will not hold any benefit when reviewed at an interim. Yet, it will pose an administrative burden and cost to PHA staff who are required to check it without a corresponding change in subsidy. Presently, PHA staff must rely on the lower levels to verify information for interims due to the outdated information on the EIV. If households have reported their income accurately during their annual recertification, any additional income sources earned later, or increases to a current income source (e.g., a pay raise), would likely not require an interim certification or back rent of overpaid subsidy due to AMHA's interim certification policy (Tiered Rent Households: any additional income will not be included until their next triennial recertification; Standard Rent Households: as long as a household member has income, any new sources of income or increases of a current source of income are not added until their next annual certification).

Level 1 will remain required at the triennial or annual recertification, depending upon the household's recertification schedule, to continue monitoring the proper reporting of income. During these reviews, any overpayment of housing assistance can be assessed and require participant repayment as needed.

In addition, AMHA will continue to regularly review and monitor the other reports contained in the EIV system (Deceased Tenants, Multiple Subsidy, Identity Verification, and Immigration reports) to ensure compliance with Federal requirements.

4. The final piece of the Local Verification Method will be to alter the definition of a "substantial difference" from equal to or greater than $2,400 to equal to or greater than $5,000. This change will decrease staff time spent investigating differences that are largely due to a lack of "current" information in EIV and streamline the IVT review process to focus on participants who are more likely to have a true income discrepancy.

These changes to the verification method will reduce cost and achieve greater cost effectiveness in federal expenditures by decreasing administrative time spent on the verification process while still gathering appropriate information. Fixed income sources do not change across the year, so updated verifications do not impact calculations. PHA staff will also save time by not re-requesting verification from applicants and participants that has fallen out of date, but is still an accurate reflection of their current situation. Finally, by streamlining the verification hierarchy and increasing the discrepancy threshold, PHA staff can move through the levels more efficiently to provide quick service to our clients, save on duplicate work and mailing costs, and reduce their time spent on reviewing outdated information.

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.

Decrease expenditures.

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

This waiver applies to all assisted households.

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

This waiver applies to both new admissions and currently assisted households.

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

This waiver applies to all family types.

Please select the family types subject to this MTW activity.

All family types.

If Other Selected in Previous Question: Please describe this target population.
n/a
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? Which Public Housing developments will participate in this activity?
This waiver applies to all assisted households
Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.
This waiver applies to all assisted households
Which Public Housing developments will participate in this activity?
This waiver 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
Implementation timeline.
AMHA will implement this initiative beginning in July 2022.
Impact analysis.
See separate attachment – OH007FY6-22Asset,VerifImpact.
Description of a hardship policy, if needed.
This is an administrative efficiency that should not require assisted families to request a hardship exemption. However, families retain their right to request an informal hearing to contest a determination of the family's income, and the use of such income to compute the housing assistance payment, in accordance with the LIPH Admissions and Continued Occupancy Plan and the HCVP Administrative Plan. Families who have a subsidy overpayment as a result of an income discrepancy can request a repayment agreement with AMHA in accordance with the HCVP Administrative Plan and LIPH Admissions and Continued Occupancy Plan.

Akron Metropolitan Housing Authority
Agency Specific Waiver – Authorized to Perform Inspections on Tenant-Based Voucher Units AMHA Owns, Manages, or Controls

Describe the MTW activity (including what specifically the agency is proposing to waive), the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.
AMHA is proposing to waive certain provisions of section 8(o)(11) of the 1937 Housing Act and 24 CFR 982.352(b)(1)(iv)(A)(3) to authorize AMHA to perform inspections on units in which AMHA has an interest in the property and a voucher holder is residing or wishes to reside in the unit. This waiver will impact all household types in the HCV program. AMHA will follow the inspection process utilizing the current HUD inspection method that is used for all other HCV properties. The inspections will be subject to AMHA's voucher program quality control processes; wherein the Quality Control Inspector re-inspects a random sample of current inspections throughout the year. This quality assurance method is available to anyone who would request it. The Quality Control Inspector selects recently completed inspections drawn from the three months preceding the re-inspection that represent a cross section of neighborhoods and the work of a cross section of inspectors. The number of inspections expected to have a quality control re-inspection is calculated as follows: if number of units is over 2,000, the number of files to be selected is 30 plus one for each 200 (or part of 200) over 2,000. Participants will also be able to request an interim/special inspection at any time if they feel an inspection need was not met. At HUD's request, AMHA must obtain the services of a third-party entity to determine if PHA-owned units pass HQS (or UPCS-V or NSPIRE in AMHA's case). At this time, AMHA is participating in the UPCS-V demonstration, which will be transitioning to the NSPIRE standards, so will continue to follow the demonstration's inspection standards until the demonstration ends. No additional waiver is needed to continue using the UPCS-V or NSPIRE inspection standards while AMHA is in the demonstration. Requiring inspections from a third party increases costs and creates potential delays in the availability of needed housing units, while adding no measurable value to the process. Conducting these inspections in house will achieve greater cost-effectiveness in federal expenditures, improve administrative efficiencies, eliminate confusion for participants/landlords, and improve the response time for conducting inspections. This waiver contributes to AMHA's larger efficiency initiatives by no longer requiring third parties to conduct rent reasonableness tests and inspections for project-based voucher and tenant-based voucher properties that AMHA has an interest in.
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.
Decrease expenditures.

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?
This waiver applies to all assisted households.
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?
Both new admissions and currently assisted households.
Does the MTW activity apply to all family types or only to selected family types?
This waiver applies to all family types.
Please select the family types subject to this MTW activity.
All family types.
If Other Selected in Previous Question: Please describe this target population.
n/a
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?
This waiver applies to HCV tenant-based units that AMHA owns, manages, or controls.
Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.
This waiver applies to HCV tenant-based units that AMHA owns, manages, or controls.
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
Implementation timeline.
AMHA will implement this initiative beginning in January 2023.
Impact analysis.
See separate attachment – OH007FY23TBVReasoners&InspectionsImpact.
Description of a hardship policy, if needed.
This is an administrative efficiency that should not require assisted families to request a hardship exemption. However, families retain their right to request an informal hearing to contest an inspections finding or responsibility in accordance with the HCVP Administrative Plan.

Akron Metropolitan Housing Authority
Agency Specific Waiver – Authorized to Perform Rent Reasonableness Determinations on Tenant-Based Voucher Units AMHA Owns, Manages, or Controls

Describe the MTW activity (including what specifically the agency is proposing to waive), the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.
AMHA is proposing to waive 24 CFR 982.352(b)(1)(iv)(A)(1) to authorize AMHA to perform rent reasonableness determinations on units in which AMHA has an interest in the property and a voucher holder is residing or wishes to reside in the unit. This waiver will impact all household types in the HCV program. AMHA will follow the rent reasonableness process used for all other properties and conduct the test using Market Vision Partners' Rentellect online system. Market Vision Partners maintains an automated database, which includes data on unassisted units for use by staff in making rent reasonableness determinations. The data is updated on an ongoing basis and purged when it is more than 48 months old. The online system uses multiple regression statistics to determine the reasonable rent. A rent comparison is not required for dwelling units receiving low income housing tax credits (LIHTC) if the rent does not exceed the rent for other LIHTC or HOME assisted units in the project that are occupied by families with tenant based assistance. The rent for these units will be considered reasonable if it does not exceed the payment standard established by the PHA. The rent reasonableness tests will be subject to AMHA's voucher program quality control processes. The Contract and Leasing Supervisor audits each rent reasonableness test for accuracy in address, requested rent, utilities, and effective date. The Supervisor and HCVP Manager review the Market Vision Partners online system for accuracy as needed. This quality assurance method is available to anyone who would request it. Additionally, at HUD's request, AMHA must obtain the services of a third-party entity to determine rent reasonableness for PHA-owned units. Conducting these rent reasonableness tests in house will achieve greater cost-effectiveness in federal expenditures, improve administrative efficiencies, eliminate confusion for participants/landlords, and improve the response time for conducting rent reasonableness analyses. Requiring approval from a 3rd party increases costs and creates potential delays in the availability of needed housing units, while adding no measurable value to the process. This waiver contributes to our larger efficiency initiatives by no longer requiring third parties to conduct rent reasonableness tests and inspections for project-based voucher and tenant-based voucher properties that AMHA has an interest in.
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.
Decrease expenditures or cost neutral.
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?
This waiver applies to all assisted households.

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?
This waiver applies to both new admissions and currently assisted households.
Does the MTW activity apply to all family types or only to selected family types?
This waiver applies to all family types.
Please select the family types subject to this MTW activity.
All family types.
If Other Selected in Previous Question: Please describe this target population.
n/a
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?
This waiver applies to HCV tenant-based units that AMHA owns, manages, or controls.
Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.
This waiver applies to HCV tenant-based units that AMHA owns, manages, or controls.
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
Implementation timeline.
AMHA plans to implement this initiative beginning in January 2023.
Impact analysis.
See separate attachment – OH007FY23TBVReasoners&InspectImpact.
Description of a hardship policy, if needed.
This is an administrative efficiency that should not require assisted families to request a hardship exemption. However, families and landlords may request a review and explanation of the unit's rent reasonableness determination.

Akron Metropolitan Housing Authority
Agency Specific Waiver – Discontinue Use of Wrong-Size Project-Based Voucher Rule

Describe the MTW activity (including what specifically the agency is proposing to waive), the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.

AMHA is proposing to waive certain provisions of 24 CFR 983.260 to discontinue the use of the wrong-size project-based voucher (PBV) rule. If AMHA determines that a family is occupying a wrong-size PBV unit, AMHA will not require the family to move out of the unit. The family will still be eligible to move with tenant-based assistance or to an appropriately sized PBV/LIPH unit if they request to do so.

AMHA's goal for this activity is to achieve greater cost effectiveness in federal expenditures, increase housing choice, and encourage self-sufficiency for participants. Turnover in PBV units can be costly. AMHA estimates that staff spend approximately 35-40 hours annually on contacting, tracking, and processing moves from wrong-size PBV units. In addition, AMHA spends around six hours to fill each now vacant PBV unit. Allowing households to remain in their under or over-sized PBV unit will provide them housing stability as well as decrease administrative time spent on forced moves. In addition, allowing households to stay in their PBV units provides them with additional housing choice. Households will still be allowed to request tenant-based vouchers, move to an appropriately sized PBV/LIPH unit, but now they have the added option of remaining in their current unit if it still meets their needs. Finally, many of AMHA's PBV projects provide supportive services, which the household will only have access to if they remain at the project. If the project does not have an appropriately sized unit, then the household will have to leave and lose access to services that would help them towards self-sufficiency.

This waiver contributes to AMHA's project-based voucher reform that intends to increase housing choice and reduce administrative burden through conducting our own inspections and rent reasonableness tests, offering project-based vouchers for shared housing units, increasing the PBV project cap, and eliminating the selection process for properties AMHA has an interest in.

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

Cost effectiveness, housing choice, and self-sufficiency.

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

Decreased expenditure.

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

This waiver applies to all assisted households living in PBV properties.

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

This waiver applies to only currently assisted households.

Does the MTW activity apply to all family types or only to selected family types?
This waiver applies to all family types.
Please select the family types subject to this MTW activity.
All family types.
If Other Selected in Previous Question: Please describe this target population.
n/a
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?
This waiver applies to all properties with project-based vouchers.
Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.
This waiver applies to all properties with project-based vouchers.
Which Public Housing developments will participate in this activity?
n/a
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
Implementation timeline.
AMHA plans to implement this initiative beginning in January 2027.
Impact analysis.
See separate attachment – OH007FY27WrongSizePBVImpact.
Description of a hardship policy, if needed.
If a household believes they have a circumstance that qualifies as a financial or other hardship related to this policy, the household must complete the Hardship Request form and attach proof of the hardship. The request will be reviewed and the household notified of the approval or denial in a timely manner. The hardship request will be denied if the form is not accompanied by documentation of the hardship and/or the request would not change the household's rent or eligibility. In the case of hardship denials, the household will be sent a denial letter stating why they did not qualify.

Akron Metropolitan Housing Authority
Impact Analysis – Agency Specific Waiver: Discontinue Use of Wrong-Size Project-Based Voucher Rule

MTW Activities Covered by Impact Analysis
Agency Specific Waiver: Discontinue Use of Wrong-Size Project-Based Voucher Rule
1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)
AMHA expects a decrease in expenditures due to decreased staff time contacting, tracking, and processing moves from wrong-size PBV units. These tasks amount to around 30 hours of administrative time annually. In addition, AMHA spends approximately six hours to fill each now vacant PBV unit. Allowing households to remain in their under or over-sized PBV unit will provide them housing stability as well as decrease the administrative time spent on forced moves. AMHA estimates this will save at least $2,300 per year in administrative costs as well as save on confusion and frustration on the part of the PBV households. AMHA may see a minimal increase in HAP expenditures if only over housed PBV households choose to remain in their wrong-size PBV unit. Based on AMHA's monitoring, the amount of wrong-sized PBV unit households is fairly evenly split between being under housed (6) and over housed (4), so AMHA believes HAP expenditures will remain stable, but will continue to track these costs as the waiver is implemented. AMHA does not anticipate that this waiver will have an impact on the agency's per family contribution as PBV households are not subject to payment standards, so their TTP will not be impacted.
2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)
No expected impact.
3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)
AMHA expects a modest increase in wait times for PBV units as these units will not open as often should the participants choose to remain in the wrong-size unit. However, there would be a corresponding modest decrease in wait times for the tenant-based voucher wait list as the PBV families would not be transferring over to these open vouchers.
4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)
AMHA expects a decreased termination rate of families due to this waiver. Currently, if a wrong-size PBV unit household fails to properly vacate their PBV unit for an appropriately sized unit, they could be terminated from the HCV program. Allowing them to remain in their wrong-size unit would eliminate this scenario.
5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program
AMHA expects a modest increase in the HCV utilization rate because wrong-size PBV unit households will be able to remain in their unit rather than risk searching for a new unit.

6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice
This MTW activity is expected to assist AMHA in meeting the statutory goal of cost effectiveness, housing choice, and encouraging self-sufficiency. It will provide greater cost effectiveness by decreasing administrative time spent on contacting, tracking, and processing moves from wrong-size PBV units and having to refill the vacant units from the wait list. In addition, allowing households to stay in their PBV units provides them with additional housing choice. Households will still be allowed to request tenant-based vouchers, move to an appropriately sized PBV/LIPH unit, but now they have the added option of remaining in their current unit if it still meets their needs. Finally, many of AMHA's PBV projects provide supportive services, which the household will only have access to if they remain at the project. If the project does not have an appropriately sized unit, then the household will have to leave and lose access to services that would help them towards self-sufficiency.
7. Impact on the agency's ability to meet the MTW statutory requirements
No expected impact as the amount of wrong-size PBV unit households is minimal.
8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity
No expected impact.
9. Across the other factors above, the impact on protected classes (and any associated disparate impact)
AMHA does not expect this activity to have any differential impact on protected classes.

Akron Metropolitan Housing Authority
Agency Specific Waiver – Allow Residency Preference Points for Mainstream Voucher Holders

Describe the MTW activity (including what specifically the agency is proposing to waive), the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.
AMHA is proposing to waive certain provisions of PIH Notice 2024-30 related to Section 8(o)(6)(A) of the 1937 Act and 24 CFR 982.207(b)(1) to allow Mainstream voucher holders to receive the wait list residency preference point. Including the residency preference point will allow AMHA to provide local housing solutions to our immediate community. AMHA's community partners have contributed greatly to the success of our Mainstream program and we want to continue to serve the locally eligible households who will have the services provided by these partners. In addition, AMHA awards a residency preference to its regular HCV program, which shares a wait list with the Mainstream program. Aligning preferences will provide administrative streamlining so that the programs operate consistently and will reduce administrative errors. Therefore, AMHA's goal for this initiative is to achieve greater cost effectiveness in federal expenditures. This waiver contributes to AMHA's overall streamlining efforts which include triennial recertifications for some households, self-certification of assets, standardized medical deduction, and a local verification method.
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 expenditure.
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?
This waiver applies to all Mainstream voucher applicants/households.
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?
This waiver applies to only new admissions.
Does the MTW activity apply to all family types or only to selected family types?
This waiver applies to all family types that meet the Mainstream voucher eligibility requirements.
Please select the family types subject to this MTW activity.
All family types.
If Other Selected in Previous Question: Please describe this target population.
n/a

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?
This waiver applies to all HCV tenant-based units and properties with project-based vouchers that house a Mainstream voucher holder.
Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.
This waiver applies to all HCV tenant-based units and properties with project-based vouchers that house a Mainstream voucher holder.
Which Public Housing developments will participate in this activity?
n/a
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
Implementation timeline.
AMHA plans to implement this initiative beginning in January 2027.
Impact analysis.
See separate attachment – OH007FY27MSPrefImpact.
Description of a hardship policy, if needed.
If a household believes they have a circumstance that qualifies as a financial or other hardship related to this policy, the household must complete the Hardship Request form and attach proof of the hardship. The request will be reviewed and the household notified of the approval or denial in a timely manner. The hardship request will be denied if the form is not accompanied by documentation of the hardship and/or the request would not change the household's rent or eligibility. In the case of hardship denials, the household will be sent a denial letter stating why they did not qualify.

Akron Metropolitan Housing Authority
Impact Analysis – Agency Specific Waiver: Allow Residency Preference Points for Mainstream Voucher Holders

MTW Activities Covered by Impact Analysis
Agency Specific Waiver: Allow Residency Preference Points for Mainstream Voucher Holders
1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)
AMHA anticipates a modest decrease in expenditures due to decreased staff time spent resequencing wait lists and updating applicant preference points. AMHA anticipates issuing an additional 2-3 Mainstream vouchers per month moving forward, which would result in approximately two hours of administrative time saved per year. While the time saved may be minimal, this waiver provides consistency across the HCV and Mainstream applicants that will prevent errors and miscommunication within AMHA and with community partners. AMHA does not anticipate that allowing the residency preference will have an impact on the agency's per family contribution.
2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)
No expected impact.
3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)
While the rate at which a voucher becomes available will not be impacted by this activity, the time spent processing an application is expected to slightly decrease. Most of AMHA's Mainstream applicants live within AMHA's jurisdiction, so their wait time may slightly decrease as non-local applicants would not receive the residency preference point. For Mainstream applicants outside of AMHA's jurisdiction, their wait time will increase.
4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)
No expected impact.
5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program
No expected impact.
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice
This MTW activity is expected to assist AMHA in meeting the statutory goal of cost effectiveness by providing consistency across the HCV and Mainstream programs and wait lists.
7. Impact on the agency's ability to meet the MTW statutory requirements
No expected impact.
8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity

No expected impact.
9. Across the other factors above, the impact on protected classes (and any associated disparate impact)
The Mainstream voucher program serves only households with a member who has a qualifying disability, so any change to preference points will impact persons with disabilities. The addition of the residency preference point may decrease wait times for Mainstream applicants within AMHA's jurisdiction and increase wait times for applicants outside of AMHA's jurisdiction.