



Harrisonburg Redevelopment & Housing Authority

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October 1, 2021

A Special Meeting of the Harrisonburg Redevelopment and Housing Authority's Board of Commissioners will be held on **Wednesday, October 6, 2021 at 4:00 p.m.**, at the Municipal Building, City Council Chambers located at 409 South Main Street, Harrisonburg, Virginia.


Michael G. Wong
Executive Director

EQUAL HOUSING OPPORTUNITY PROVIDER

HRHA provides reasonable accommodations to persons with disabilities consistent with the Section 504 Final Rule (24 CFR Part 8) and the Fair Housing Amendments Act

**AGENDA
Special Meeting
October 6, 2021**

- I. Call to order and determination of quorum**
- II. Public Comment MTW Safe Harbor Policy**

MTW Safe Harbor Waiver Request

Harrisonburg Redevelopment and Housing Authority – VA014

HRHA requests a Safe Harbor Waiver for the following group of MTW activities.

1. Tenant Rent Policies

The agency is authorized to adopt and implement the activities listed below for setting tenant rents in public housing, including but not limited to establishing definitions of income and adjusted income that differ from those in the current 1937 Act and its implementing regulations. The agency is authorized to adopt and implement the activities listed below to establish total tenant payments (TTP)¹ in the HCV program, and/or tenant rents for tenant-based and project-based voucher (PBV) assistance that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. The agency is authorized to adopt and implement the activities listed below to calculate the tenant portion of the rent in a way that differs from the currently mandated program requirements in the 1937 Act and its implementing regulations. The agency must determine initial eligibility in accordance with 24 CFR 5.609 and must comply with section 3(b)(2) of the United States Housing Act of 1937 Act (1937 Act) (42 U.S.C. §1437). For voucher activities, the Department has developed a standard rider to the HAP contract that reflects any MTW authorizations that amend the current requirements of the HAP contract.

1f Minimum Rent. Increase minimum rent to \$100 for all households.

Statutes and Regulations Waived

Minimum Rent (HCV) - Certain provisions of sections 3(a)(3)(A) and 8(o)(2)(A)-(C) of the Act and 24 CFR 5.628 and 5.630.

Safe Harbors

- 1.f. i. Minimum rent must not exceed \$130 per month.
- ii. Agency must exclude elderly and disabled families from rent policy.
- iii. Agency must conduct an impact analysis. *
- iv. Agency must implement a hardship policy. *

1h Total Tenant Payment. Increase total tenant payment to 35 percent of income for all households

Statutes and Regulations Waived

Tenant Payment as a Modified Percentage of Income (HCV) - Certain provisions of sections 3(b)(4)-(5) and 8(o)(2)(A)-(C) of the 1937 Act and 24 CFR 5.609, 5.611, and 982.516.households.

Safe Harbors

- i.g. and i.h. i. The Tenant Payment in public housing and the Tenant Payment in HCV must not exceed 32% of income for non-elderly/non-disabled families if the agency is utilizing flexibility under activities 1.r., 1.t. and/or 1.v. (for 1.g.) or 1.s., 1.u. and/or 1.w. (for 1.h.).
- ii. The Tenant Payment in public housing and the Tenant Payment in HCV must not exceed 35% of income for non-elderly/non-disabled families if the agency is not utilizing flexibility under activities 1.r., 1.t. and/or 1.v. (for 1.g.) or 1.s., 1.u. and/or 1.w. (for 1.h.).
- iii. Agency must exempt elderly and disabled families from rent policy.
- iv. Agency must conduct an impact analysis. *
- v. Agency must implement a hardship policy. *

1s Elimination of Deductions. Eliminate expense deductions for unreimbursed child care and medical expenses for all households.

Statutes and Regulations Waived

Elimination of Deduction(s) (HCV) - Certain provisions of sections 3(a)(1), 3(b)(4)-(5) and 8(o)(2)(A)-(C) of the 1937 Act and 24 CFR 5.611, and 982.516.

Safe Harbors

- i.r. and i.s. i. Agency must conduct an impact analysis. *
- ii. Agency must exempt elderly and disabled families from rent policy. *
- iii. Agency must implement a hardship policy. *

1u Standard Deductions. Increase standard deduction for all elderly/disabled households from \$400 to \$1,500 per month to offset the minimum rent of \$100 per month, increased TTP to 35 percent, and the elimination of medical expense deductions.

Statutes and Regulations Waived

Standard Deductions (HCV) - Certain provisions of sections 3(a)(1), 3(b)(4)-(5), and 8(o)(2)(A)-(C) of the 1937 Act and 24 CFR 5.611, and 982.516.

Safe Harbors

- i.t. and i.u. i. Agency must conduct an impact analysis. *
- ii. Agency must implement a hardship policy.

1w Alternate Income Inclusions/Exclusions (HCV). Exclude student income over tuition. Exclude all wage income for household members age 20 and below. Count all wage income for household members 21 and older. Applies to all households.

Statutes and Regulations Waived

Alternative Income Inclusions/Exclusions (HCV) - 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, 5.611, and 982.516.

Safe Harbors

1.v. and 1.w. i. Agency must exempt elderly and disabled individuals from this rent determination policy.

Requested Waiver and Explanation

Total tenant payment request is **35 percent of household income using flexibilities under 1s, 1u, and 1w**, which is outside the Safe Harbor maximum of 32 percent. Total package of changes applies to **all households** instead of excluding elderly and disabled households, which is outside of Safe Harbor. HRHA plans to offset increases by raising the standard deduction for elderly/disabled households from \$400 to \$1,500 per month. Hardship policy is in place for households who face rent burden.

HRHA believes this total package of changes is necessary to achieve maximum staff efficiency and cost effectiveness under MTW flexibilities. The combination of changes encourages employment and self-sufficiency without significantly increasing overall costs for households. These simplifications make rent calculations more understandable for tenants. The changes save tenants' time and in many cases lower costs. Decreased staff paperwork allows more time to work with tenants, explore new projects, or participate in training in possible new areas or expanded services. Simplified paperwork also benefits landlords by determining household eligibility more quickly.

See Impact Analysis and Hardship Policy attached.

MTW Safe Harbor Waiver Request
Harrisonburg Redevelopment and Housing Authority – VA014
HRHA requests a Safe Harbor Waiver for the following MTW activity.

2b Payment Standards – Fair Market Rent (HCV)

2. Payment Standards and Rent Reasonableness

The agency is authorized to adopt and implement any reasonable policy to establish payment standards or rent reasonableness that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. For voucher activities, the Department has developed a standard rider to the HAP contract that reflects any MTW authorizations that amend the current requirements of the HAP contract.

Statutes and Regulations Waived

Payment Standards – Fair Market Rents (HCV- Tenant-Based Assistance) - Certain provisions of section 8(o)(1)(B) and 8(o)(13)(H) of the 1937 Act and 24 CFR 982.503-505 and 983.301.

Safe Harbors

- 2.b. i. Payment standard must be between 80% and 120% of the FMR.
- ii. Agency must implement an impact analysis. *
- iii. Agency must implement a hardship policy. *

Requested Waiver and Explanation

HRHA requests to increase payment standard from current 110 percent of FMR to 120 percent for 1BR units and to **140 percent for 1BR accessible units**. Increase to 140 percent is outside of Safe Harbor of 120 percent maximum but necessary as an incentive for landlords to accept vouchers for scarce 1BR accessible units in our tight housing market and to increase housing choice for tenants requiring these features. HRHA will determine if unit qualifies.

City population as well as tens of thousands of student renters attending James Madison University and Eastern Mennonite University both continue to increase. Adults 65 years and older represented 13 percent of Harrisonburg's overall population growth from 2010 to 2018. HRHA has more than 2,700 applicants on the waiting list for a Housing Choice Voucher. With 38 households currently searching for a 1BR unit, and 581 total households on the 1BR waiting list, this attempt to increase housing choice and number of accessible units by raising the payment standard is necessary in our tight rental market.

The City of Harrisonburg Comprehensive Housing Assessment and Market Study released in January 2021, reported the following information:

The rental vacancy rate is low at 2-3.5 percent, indicating a tight market with a low inventory. This creates high levels of competition within the market as renters compete for scarce units and where the lowest income households have the fewest options.

The most severe shortage of affordable housing is for households who earn 0-30 percent AMI. These extremely low-income households often spend more than 50 percent of their income on housing. Some of these households have fixed incomes and disabling conditions that make working difficult.

Only 10 percent of all units are affordable to 0-30 percent AMI households, most of which are larger units. Only 230 studio and one-bedroom units are affordable to these households, a critical unit type needed to meet the needs of 1-to-2-person and single-person households needing supportive housing.

The same housing study also showed that the demand for supportive housing units is estimated to be between 84 and 94 elderly households and between 445 and 509 non-elderly individuals. The majority of these units are required to meet the needs of persons with serious mental illness and intellectual or developmental disabilities.

Over the next five years, there is also a need for 126 PSH beds for persons experiencing chronic homelessness and trying to exit homelessness in the Western Virginia Continuum of Care, which covers a six county region from Harrisonburg to Winchester.

Households are protected by a hardship policy. See Impact Analysis and Hardship Policy attached.

MTW Safe Harbor Waiver Request
Harrisonburg Redevelopment and Housing Authority – VA014
HRHA requests a Safe Harbor Waiver for the following MTW activity.

3b Alternative Reexamination Schedule for Households (HCV)

3. Reexaminations

The agency is authorized to implement a reexamination program that differs from the reexamination program currently mandated in the 1937 Act and its implementing regulations. The terms “low-income families” and “very low-income families” shall continue to be defined by reference to section 3(b)(2) of the 1937 Act. MTW agencies must continue to determine the initial eligibility of the family in accordance with provisions of 24 CFR 5.609.

Statutes and Regulations Waived

Alternative Reexamination Schedule for Households (HCV) - Certain provisions of section 8(o)(5) of the 1937 Act and 24 CFR 982.516 (a)(1) and 982.516(c)(2).

Safe Harbors

3.a. and 3.b.

- i. Reexaminations must occur at least every three years.
- ii. The agency must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more.
- iii. Agency must implement an impact analysis. *
- iv. Agency must include a hardship policy. *

Requested Waiver and Explanation

HRHA requests to change to reexamination every three years with an interim decrease once per year if household has a **20 percent** or more decrease of gross income for household total income. The 20 percent decrease in income is outside the Safe Harbor allowance of 10 percent. HRHA offsets this difference through allowing households to keep any income increases until the next certification. In order to achieve cost effectiveness, HRHA needs most households to move to a triennial schedule. Requiring larger percentage decrease will reduce requests for interims. Requiring a larger income decrease for interims encourages employment and self-sufficiency. Allowing households to keep income gains until the next reexamination allows them to save for a rental deposit or homebuyer down payment, improving housing choice.

Households are protected by a hardship policy. See Impact Analysis and Hardship Policy attached.

HRHA MTW Hardship Policy

This Hardship Policy applies to the following MTW activities:

- 1) Tenant Rent Policy – the entire package of changes affecting minimum rent; total tenant payment; alternate utility allowance and utility reimbursements; eliminated deductions and standard deductions; and alternate income inclusions and exclusions;
- 2) Payment standards; and
- 3) Triennial recertification and interims.

Definition of Hardship Types

A **HARDSHIP** exists when:

The family has lost eligibility for or is awaiting an eligibility determination for a federal, state, or local assistance program;

The family would be evicted as a result of the imposition of MTW activities;

The family has experienced a decrease in income because of changed circumstances, including loss or reduction of employment, death in the family, or reduction in or loss of earnings or other assistance;

The family has an increase in expenses because of changed circumstances, such as for medical costs, childcare, transportation, education, or similar items; and

Such other situations and factors determined by the agency to be appropriate.

NO HARDSHIP exists when:

HRHA determines there is no qualifying hardship

MTW activities will be reinstated, including requiring back payment of minimum rent and other costs or fees to HRHA for the time of suspension

TEMPORARY HARDSHIP exists when:

HRHA determines that there is a qualifying hardship but that it is of a temporary nature

The MTW activity will not be imposed for a period of 90 days from the date of the family's request

At the end of the 90-day period, the MTW activity will be imposed retroactively to the time of suspension

HRHA will offer a reasonable repayment agreement for any minimum rent back payment and any other costs and fees paid by HRHA on the family's behalf during the period of suspension

LONG-TERM HARDSHIP exists when:

The Housing Authority determines there is a long-term hardship

The family will be exempt from the MTW activity until the hardship no longer exists

The HRHA Hardship Policy allows the authority the flexibility to address unique, unforeseeable circumstances that may occur and to protect families in crisis. To be considered for a hardship exemption, the household must apply for all benefits for which it may be eligible. Zero income households must report income changes when income begins.

Until income is restored to the household, households must continue to meet the definitions of hardship types above and also meet all of the following criteria:

Remain in compliance with all program requirements

Not owe HRHA any money or be current with a re-payment agreement

Continued lack of income has not been through the fault of the household

Have applied for financial resources it may be eligible for but been unsuccessful in securing those

Request the hardship waiver within the deadline set by HRHA. Households have 10 business days from the date of their "Notice of Change" letter in which to request an Informal Hearing

Have not received hardship relief for the same MTW activity previously

Minimum rent - If paying 35% of the household's monthly adjusted income creates a hardship, households may pay reduced rent for some time period according to the policies and guidelines above for Hardship Types as determined by HRHA.

Elimination of Unreimbursed Child Care/Medical Expense Deduction - The few households that may experience a hardship from the elimination of the Child Care or Medical Expense deduction may make a request for rent reduction according to the policies and guidelines above for Hardship Types. Increased standard deduction offsets this change for elderly/disabled households.

Each household is eligible for only one term of relief for each rent reform initiative. If the household qualifies for more than one relief at any given recertification (annual or interim), the reliefs will be calculated concurrently.

Payment Standards – HRHA is raising the 1BR payment standard to 120% and raising the 1BR accessible unit payment standard to 140% of FMR only for families requiring those features; HRHA will determine if unit qualifies. Where payment standards cause a household hardship, HRHA will apply its Reasonable Accommodations policy.

Triennial Certification and Interim Requests – New recertification schedule will be once every three years. Households may request one interim recertification per year if they have a 20% or more decrease in total household income. Households at zero income will have an interim certification when new income begins, or after 3 months of zero income an interim will be completed with income from previous certification.

For households experiencing a hardship beyond these parameters, HRHA will consider classifying it as a long-term hardship according to the policies and guidelines above.

Voucher Portability

Portability for PBV units in Franklin Heights will be restricted to 24 months.

Move requests will be handled according to HRHA's existing Portability Policy. HRHA's Reasonable Accommodation Policy will still apply.

Requesting a Hardship Exception

The family must formally request a hardship exception by submitting a completed Request for Hardship Exception in written form to HRHA. Forms are available upon request at HRHA's administrative office.

If a family requests a hardship exemption, HRHA will suspend the MTW activity beginning the month following the family's hardship request. The suspension will continue until HRHA can determine whether hardship exists and whether the hardship is of a temporary or long-term nature. During suspension, the family will not be required to participate in relevant MTW activities and support will be adjusted accordingly.

Determination will be made as soon as possible but will not take longer than 10 business days.

If the request does not meet the hardship standards, MTW activities must resume and HRHA will collect any retroactive rent and other fees, if applicable, through a reasonable repayment agreement.

If the request does meet the hardship standards, HRHA will continue to provide an exemption from the MTW activity at a reasonable level and duration in accordance with its MTW policies.

Appeals

Families who disagree with the hardship review decision may appeal the determination through HRHA's existing grievance process.

Notification of Residents

HRHA will:

Notify residents of its hardship policy at intake;

Review its hardship policy with residents at recertification; and

Consider if a resident qualifies for a hardship exemption when assistance is to be terminated due to an MTW activity.

Required Record Keeping

HRHA will preserve all records of hardship requests, determinations, and appeals for the duration of its MTW participation.

HRHA will maintain records to ensure traceability of activities and comply with all applicable regulations. When compliant and reasonable, documentation will be maintained in electronic format.

Records will be available for public review and inspection at the agency's principal office during normal business hours and supplied to HUD if requested.

Feedback and Notes from Commerce and Lineweaver Annex Meetings May 28, 2021

Commerce Village - 15 participants – 3:00 to 3:45pm

? Question initially about lease every three years and cert.

Sandra overviewed triannual certifications and explained how income will impact rent. Explained zero rent cert. Explained current rent 30%, explained jump to 35%. Explained elderly/disabled deduction increase to compensate jump to 35%.

? asking for where can get more information. Sandra explained ACOP will be online.

Explained waiver to request rent adjustment if hardship.

Explained commerce waiving min rent. Commerce min rent is 0.

Explained don't worry about childcare or utilities.

Went back and overviewed all major changes again.

- Annual review to every three years. Will meet every year for tax credit property meeting. Starting Jan 1 that is your rent until annual review. If you start working after Jan 1 (except 0 income) rent will not change.
- Explained if lose job, can request rent decrease once per year.
- Explained inspections every two years.
- Percent increase and increased in allowance.

? Question: So none of the stimulus checks will impact rent going up? Sandra answers that is correct

? Question about when this will go in effect. Sandra explains annual reviews happening over next three years.

? Question about happening just here or all over city/state.

? Question about when this goes into effect again if someone just got a certification.

? Question about MtW, what is it and how does it work?

Sandra explains overview again. Clarifies MtW as name of designation/change.

? Question about combining elderly and disabled. Sandra clarifies \$1,500 max.

? Questions about Medicare. Sandra says ask Social Security Admin.

? Question about how big these changes are, city wide, state wide, country wide. Sandra clarifies this is for Harrisonburg Housing Authority.

Participant provided update on former resident.

? Question again about if moving to work means there is help to find work or if there is work requirement.

Sandra clarifies and clarifies difference between meetings for tax credit responsibilities and certifications/income.

? Question about why it takes so long for someone to move in after someone moves out. Sandra clarifies process with Veterans Affairs.

Asks if any more questions.

Sandra offers some other general updates. CSB person, catered dinner.

Offered if any more questions they can come talk with her if not comfortable asking in group.

Lineweaver Annex Meeting – 11 participants - 4pm to 4:45pm

Sandra clarifies that MtW does not mean forced work.

- Overviews process moving to triannual certs.

? Question about leases and certifications. Sandra clarifies lease every year but certification every three.

? Questions about difference between property manager and main office (Kristin).

Sandra overviews process with main office. Explains increase from 30% to 35% and adjustment in elderly/disabled deduction \$400 to \$1,500. Clarifies increase in income will not raise rent. Explains zero income.

? Question about asset raise and what counts as asset. Sandra clarifies not personal property.

? Will Lisa let us know if rent goes up? Sandra clarifies that Kristin handles amount of rent not Lisa.

? Question about if Waynesboro is involved in this. Sandra clarifies that they just do inspection.

? Question about how changes will effect if only income is SSI. Sandra clarifies 35%, disabled deduction.

? Question about minimum rent. Sandra clarifies minimum rent expectations.

Sandra explains that residents may fall into 2022, 2023, or 2024 years. Explained don't worry if no letter comes about certifications this year.

? Question about moving out of Lineweaver.

? Question about fair housing law changes. Sandra says unaware at this time.

Sandra explains inspections schedule.

Sandra explains income for family members under 20, education.

Asks if any final questions and offers opportunities to follow up, attend focus group, or speak with main office.

MTW Community Stakeholder Comments – June 3, 2021- 10am-11:30am in Zoom meeting

Community Stakeholders: John Whitfield, Blue Ridge Legal Services; Jerri Lee, First Step; Sandra Quigg, Boys and Girls Club; Jo Benjamin, United Way; Gayl Brunk, Valley Associates for Independent Living; Adam Yoder, HRCSB; Hannah Bailey, Strength in Peers; Ben Craig, Way to Go; Shannon Porter, Mercy House; Sabrina Herron, Mercy House; Noah Yoder, Mercy House.

HRHA Staff: Michael Wong, executive director; Liz Webb, HCV manager; Zoe Parakuo, family self-sufficiency coordinator; Everett Brubaker, resident services and communication coordinator; Kim Haines, grant coordinator.

Michael Wong gave an overview of the MTW program and HRHA's goals and activities.

? how is very low income measured; Michael explained current standards and breakdown of current residents

Educational goals:

? on if GED incentive needs to be higher, depending on how many clients entering the program need to earn one; if many people need to earn it before other degrees then incentive maybe should be higher; points made that GED is harder to earn than high school diploma; require colleges attended to be accredited; Everett said maybe will break down GED into steps with incentives for each – HRHA will re-examine

? What counts as ESL completion – a course, certificate, what level of achievement; May want to clarify

? Who pays for GED and other degrees and vocational training; Zoe explained BRCC gives discounted tuition; clients can use escrow funds, and HRHA helps with course fees; HRHA will look at more ways to offset tuition and costs

Financial goals:

? On credit repair how much improvement is needed to get incentive and how many times can people earn one; is a certain score required; should incentive process account for starting score for each person since many will be low; should maintaining an achieved score be required; do people have enough time in the program to improve score significantly; Michael said 720 is needed for homeownership; program lasts 5-6 years; HRHA will clarify incentive structure

? Where does money come from for incentives; Michael explained from fungibility of housing and admin funds from HCV program; incentives parallel current FSS program but provide a more immediate reward than escrow process

? To get incentive do people have to stick to the budget they create or just participate in learning budgeting; what proof is required; will they use a budget tool or app or bank apps; many people do not use banks; Zoe and Everett said main goal is to teach budgeting and monthly expense tracking; goal is to coach and educate, not penalize; Michael mentioned free financial literacy classes and resources

Commenters like financial literacy as a powerful skill to have; like the move away from a punitive approach to coaching model

Employment:

? are incentives for full time work only; for staying with the same employer; what about flex jobs; or minimum hours per week at any jobs; encourage work at same employer to achieve FT job with benefits; tiered options for short term gig work vs long term FT work; HRHA will clarify standards

Homebuyer readiness:

Everett explained rent to buy courses that clients take now online; they have no fees

Family wellness:

? Increase incentives to include nutrition, physical wellness, well baby checks, classes for pregnant couples; immunizations; can clients get to the medical office; do clients view health care as for illness only not for prevention; do people have insurance coverage; are incentives enough to overcome barriers to care.

Commenters liked the emphasis on mental health, which is often overlooked and not covered by insurance, and the focus on wellness. Michael said a holistic approach is one goal.

FSS participation:

Michael explained that currently clients get credit for meeting with staff; money goes into escrow monthly but most cannot be accessed until end of program; new model means funds could be available immediately; Everett said feedback from clients is some like that they cannot access the money easily.

? Can clients switch between escrow deposit or receiving a check each month; Everett said that is the ideal situation if that choice can be set up and managed easily; tiered escrow is closest to traditional model; new model will allow earnings for people working but also earnings for those not working but completing other activities

? Consider incentives for kids' education and other kids' activities such as nutrition program at school

? Will incentives in practice be equitable between English speakers and ESL speakers; HRHA will evaluate

Landlord incentives:

? Can the time limit on finding a place to use voucher be increased given that meeting the current time frame is difficult; Michael said extensions were given for COVID but not allowed in MTW

? What efforts are made to persuade landlords averse to working with HRHA, especially large rental entities; Michael said HRHA did an analysis of small vs larger landlords; large property managers price out clients with management fees; HRHA does meet with landlords and realtors' association – they like HRHA but do not need us as they can get higher rent from others

? Can amount of voucher be increased; Michael explained there is some leeway but it has to be balanced with mandate to serve substantially the same number and types of clients

? Can city be influenced to mandate inclusionary zoning; stakeholder said that comment period on city zoning changes starts next week

Commenter likes help from housing coordinator to navigate voucher use in a timely manner

Cost savings:

Michael explained the overall cost savings of the MTW changes and activities that will offset rent increases with a goal to be cost neutral to the extent possible – such as increasing some allowances and eliminating earned income disallowances. Increase to 2-year initial lease term in Franklin Heights explained.

Commenters wanted more info and details; Michael outlined sample rent and utility changes for different sized units and noted that was without considering the triennial certification that will allow clients to keep increases in income longer.

? Will removing child care deductions negatively impact families with children vs without children; is child care cost largely subsidized or discounted; should policy stay the same but be reworded to emphasize what is gained in MTW changes instead of what is lost; HRHA will consider.

? Will families be billed back for income increases at triennial certification; no

Commenters like elimination of school grant as income.

? Are MTW changes federal, state or local; Michael said they are local to improve outcomes and flexibility for customizing programs at participating PHAs. He explained lots of HRHA planned changes have been done at legacy MTW PHAs and resulted in increased client self-sufficiency and eliminated their need for subsidies more quickly.

Michael covered the timeline for MTW, including HRHA's implementation schedule; shared opportunities and avenues for more feedback through listening sessions and public comment period for supplement; stressed that HRHA wants to avoid unintended negative consequences of changes and that the program has the flexibility to make changes as it goes on.

Commenters want to be included in future discussions and suggested inviting Church World Service and Skyline Literacy to comment.

Commenters mentioned finding accessible housing is difficult and can take 3-4 months even for accessible student housing. Michael said HRHA is open to suggestions for working with landlords on long term contracts for accessible units or other options. He noted that building new housing is the core need and cannot be done without City Council approval.

Commenter said to consider paying people to spend more time at school with a goal of a higher income later may be effective. Noted that many trades pay higher than professional degrees in some fields.

Michael thanked everyone for the helpful feedback and thoughts.

See more comments from Zoom chat session below:

Comments in chat from Community Stakeholder meeting June 3, 2021 - 10am-11:30am

10:28:09 From Everett Brubaker to Everyone : To clarify broadly these incentives are open to ~90 participants who are participants in the Family Self-Sufficiency program. The traditional escrow model provided monthly financial savings based on increases in rent in from program start. The calculation is confusing, and based solely on increases in income. This transition to incentive opens escrow earnings to more participants and helps provide building blocks in a variety of self-sufficiency areas.

10:33:24 From B. Craig to Everyone : Circling back to the Educational Wellness: Specifically, the requirement for obtaining a "Certificate" to receive the incentive; you might want to clarify the achievement associated with the award. For example, there are Master's programs where can earn a certificate, but not a full Master's degree. Master's certificates are like a solid sampling of a full Master's degree program.

10:34:44 From Everett Brubaker to Everyone : Thanks Ben!

10:36:25 From Everett Brubaker to Everyone : Ben you all use an online module set with WaytoGo participants yea?

10:37:23 From Jo Benjamin to Everyone : Brad Barnett in Financial Aid at JMU offers a class on basic budgeting and finance that is excellent.

10:38:20 From Gayl Brunk to Everyone : YES!! Brad Barnett is awesome!!!

10:38:47 From B. Craig to Everyone : Yes! F&M Bank (and BB&T) use an EverFi on-line system:
<http://atwork.everfi.net/fmbank/login>

10:42:02 From Everett Brubaker to Everyone : We would love more ideas on family wellness section!

10:44:33 From B. Craig to Everyone : Financial Wellness: I like the Financial Literacy piece as an incentive. I also appreciate securing a Checking Account (not easy for our clients to achieve!) at an FDIC lender as an incentive. This will help them obtain a loan for their first home; finance a car, etc. You could also link the "Checking Acct." to an additional incentive (e.g., no overdrafts.... overdrafts hurts a related item on our list: Credit).... linking the two in a way.

10:46:27 From Noah to Everyone : Once they have a checking account, that provides another tool for budget/coaching. Simply going over a monthly bank statement and physically showing a household where their money is being spent can be extremely helpful

10:46:51 From Everett Brubaker to Everyone : Thank you both! Good thoughts.

10:48:23 From B. Craig to Everyone : Speaking of children: what about their educational success as an incentive under Family Wellness? E.g., improved grades, or maintaining high grades earns the HH an incentive. This helps to (hopefully) engage the parent further in their child's success at school.

10:49:01 From Jo Benjamin to Everyone : Happy to facilitate connections to community resources to help participants navigate obstacles to access for any of the incentive items we're discussing.

10:50:17 From Jo Benjamin to Everyone : Agree to consider incentives that focus on children. For families stuck in the cycle of generational poverty, helping kids break that cycle would be huge. Literally life-changing.

10:50:35 From Gayl Brunk to Everyone : Extension also has nutrition classes-at least used to-and nutritional classes.

10:50:56 From B. Craig to Everyone : ^^^ Exactly, Jo! A child's educational success can hopefully lead them out of poverty

10:51:36 From Jo Benjamin to Everyone : Incentives for pre-natal care for new/expecting parents?

10:52:35 From Sabrina Herron to Everyone : For financial literacy: I am currently working with DCCU about setting up financial literacy classes if that's something you all would also be interested in. The presenter is doing it via zoom but is providing light refreshments and we're offering residents a chance to win a grocery gift card for coming. Something you may want to look into :)

10:53:22 From Jo Benjamin to Everyone : Agreed, Ben.
That's awesome, Sabrina! I would be interested in hearing more about that. Will email you.

10:53:27 From Everett Brubaker to Everyone : Thank you all. Sabrina we will follow up that is great!

10:53:34 From John Whitfield to Everyone : I know I haven't added anything to the conversation this morning, but I am interested in all this, for sure. Unfortunately, I have to drop off in order to make a presentation to the Warren County United Way at 11.

10:53:44 From Adam Yoder, HRCSB to Everyone : Will there be obstacles for non-english language speakers that we need to take into account in order for them to complete activities and earn these incentives? Is there equity between english and non-english speakers?

10:53:45 From Zoe Parakuo to Everyone : Thanks everyone, we will follow up.

10:56:41 From B. Craig to Everyone : I'm not super-familiar with the barriers to attracting landlords to participate in this program; but appears you have addressed some of them in your proposal.

10:59:50 From B. Craig to Everyone : Not something I anticipate this group to accomplish on its own, but I would like to see City of Harrisonburg enact an Inclusionary Zoning ordinance: require a given share of new construction to be affordable by people with low to moderate incomes.

11:00:37 From Jo Benjamin to Everyone : The City is getting ready to share their proposed changes to Zoning Ordinances to gather public comment. Watch for it in the coming weeks.

11:02:07 From B. Craig to Everyone : Good to know! Thanks, Jo.

11:02:14 From Jo Benjamin to Everyone : <https://harrisonburgva.gov/zoning-subdivision-ordinances-update>

See Milestones section - there are public open houses scheduled

11:09:42 From B. Craig to Everyone : Re-circling back to the Educational Wellness comment I made earlier: Also, might want to think about incentive structure based on what type of school attended (e.g., accredited; for-profit, etc.)... certainly there is more value in a certificate/degree from a school like a EMU/BC/JMU vs. an institution like an American National University.

11:10:51 From B. Craig to Everyone : ^ Not laying any shade on a place like ANU, but the degree will bring higher earning potential if from an accredited, non-profit Higher ed institution

11:12:34 From Jo Benjamin to Everyone : There are some reputable accredited non-profit higher education institutions that offer online degrees that may be more accessible to working folks. There are some very shady for-profit online courses that do a very good job of pretending to be legit. It's a level of informational literacy to be able to tell the difference between the two and look for accreditation.

11:14:26 From Everett Brubaker to Everyone : Thanks Jo and Ben! Worth clarifying.

11:14:27 From Jo Benjamin to Everyone : Alongside this, agree with Adam about considerations for non-English speakers or English language learners and their ability to achieve any of those educational incentive points during the duration of the program.

Also, defining "ESL Completion" might be a good convo to have with Nelly Shenk at Skyline Literacy.

11:16:07 From B. Craig to Everyone : Agreed - Thanks, Jo! This program should educate participants about the differences between all of the varied higher-ed offerings so they can make an informed choice. Either way you slice it, higher-ed is costly and we don't want folks to pump their money into a program that will not launch them forward like they think

11:23:23 From Adam Yoder, HRCSB to Everyone : Gotta run. Thank you Michael, Everett and Zoe. Very hopeful and excited about this program's potential.

11:24:42 From Sandra Quigg to Everyone : Michael, you, Everett and Zoe have done a great job of making the program mostly positive-based rather than punitive. Nicely done.

11:25:12 From B. Craig to Everyone : Yes! Great job. You obviously put a lot of research hours and thought behind all this.

11:26:11 From Jo Benjamin to Everyone : Appreciate the opportunity to give feedback! MTW is moving in a good direction. :-)

11:27:28 From Everett Brubaker to Everyone : Also deserving of recognition are Kim Haines on this call who is handling the grant reporting requirements and the HCV team led by Liz Webb who did much of the work researching what proposals make sense for our residents, participants, and staff. Additional staff like Sandra have also been instrumental!

11:35:46 From Shannon Porter to Everyone : Thanks Michael... it looks very promising

11:36:31 From Noah to Everyone : I need to go as well, but great seeing you all again and thank you! Looking forward to the next time

Call Backs and Phone Conversation Feedback

Per Kristin

MtW Call Backs or Phone Conversation Feedback/Question Template:

Date: 6/8/2021

Participant Voucher/residence (Lineweaver, FH, HCV, etc): Lineweaver, resident mom

Questions or confusions regarding MtW: Concerns about rent increasing

Feedback on changes (list feedback and which change it relates to): Making sure the rent responsibility from 30% to 35% of adjusted income is not going to increase rent.

Per Everett

MtW Feedback:

Date: June 10, 2021

In person conversation

Participant Voucher/residence (Lineweaver, FH, HCV, etc): HCV and FSS

Questions or confusions regarding MtW: n/a

Feedback on changes (list feedback and which change it relates to):

Feedback on FSS escrow: Supportive of new escrow models. Currently a high escrow earner in FSS (near \$25,000 cap) and recognizes value of traditional model for someone like herself who came into the program not working. However she did state, "I never felt involved in escrow. I knew nothing about how it was calculated or how it was done". She likes how clear the new system is and the different opportunities to earn escrow. Though given how much she makes in the traditional model she doubts she would transition to the new model. She is about to graduate as well.

Per Everett

MtW Feedback:

Date: June 14, 2021

Phone conversation

Participant Voucher/residence (Lineweaver, FH, HCV, etc): HCV and FSS

Questions or confusions regarding MtW:

Confusion around when new FSS program would start. Questions about what is needed to prove someone did incentives listed.

Clarified proposals and start date in 2022.

Feedback on changes (list feedback and which change it relates to):

Ashley shared that she really liked the incentive list and is already thinking about ones to do. Likes incentive option to go into savings escrow account rather than immediate check. "The incentives look like it would motivate people to work more. I'm excited to do everything on the list."

Focus Group online meetings Wednesday, June 9

11am and 6pm

One commenter had difficulty with the computer connection. Staff followed up to obtain input and commenter has not responded as yet.

MTW Staff – June 29, 2021

Review of feedback from tenants and stakeholders conducted from May 28 to June 29, 2021

HRHA gathered feedback through call-in sessions and zoom meetings, calls to participants and residents, mailings to residents in multiple languages, and more.

Feedback overall was positive from residents and community stakeholders, especially for changes in Family Self-Sufficiency incentives, triennial household certifications, rent policies, and landlord incentives. Stakeholder input and questions did lead to a number of MTW plan refinements.

A major MTW change with the FSS program is a transition away from an escrow/savings model based on increases in rent at start of program and toward a clearer, incentive/rewards based savings model. Based on feedback, HRHA increased incentive amounts for educational achievements such as obtaining a GED, certifications, or an associate's degree and added more incentive opportunities such as getting an annual physical, attending parenting classes, and others. HRHA also clarified details about requirements and incentive earnings that stakeholders had identified as vague.

Based on concerns about increases in rent and/or loss of certain deductions such as child care when calculating rent, HRHA clarified that there are safe harbor and hardship policies in place. HRHA also emphasized that other MTW proposals will balance the rent increases and loss of certain deductions, such as moving to triennial certification so participants can keep more of their earned income.

Impact Analysis

Activity	<p>Tenant Rent Policies</p> <p>1f. Minimum rent</p> <p>1h. Tenant payment as modified percentage of income</p> <p>1j. Alternative utility allowance</p> <p>1n. Utility reimbursements</p> <p>1s. Elimination of deductions</p> <p>1u. Standard deductions</p> <p>1w. Alternative income inclusions, exclusions</p> <p>Minimum rent will be \$100 for all households. TTP will increase to 35% of income. One utility allowance for all unit types, varying by unit size. Eliminate utility reimbursements under \$20 per month. Eliminate unreimbursed childcare and medical expense deductions. Standard deduction for all elderly/disabled households will increase from \$400 to \$1,500 to offset other changes. Exclude student income over tuition, exclude all wage income for household members age 20 and below, and count all wage income for students 21 and above.</p>
<p>1. Describe the activity's impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)</p>	
<p>Totality of changes should be neutral, not expected to impact agency finances significantly. Anticipated benefit to the agency due to anticipated increase in voucher utilization. Possible staff time savings/admin costs savings in the long term.</p>	
<p>2. Describe the activity's impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs);</p>	
<p>Housing costs will increase moderately for most households, and not at all for some. See analysis of sampling of households attached. Households will more easily understand simplified calculations. Increased minimum rent and TTP are expected to act as an incentive for employment along with the implementation of a triennial certification process. Changes allow for greater housing choice and increased access to housing due to a clear understanding from landlords and households of tenant rent responsibilities. Increased access to housing is anticipated due to the ability of households to use more of their income to access housing.</p>	
<p>3. Describe the impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist);</p>	
<p>No impact</p>	
<p>4. Describe the 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);</p>	
<p>Impact should be minimal due to total package of changes balancing each other out and hardship policy coverage for those who need it.</p>	
<p>5. Describe the impact on the agency's current occupancy level in public housing and utilization rate in the HCV program</p>	
<p>None expected</p>	

Impact Analysis

6. Describe the impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice;

Simplifications make rent calculations more understandable for tenants and allow hardship exceptions if necessary. Changes save tenant time and in many cases decrease costs. Increased minimum rent and TTP expected to act as incentive for employment. Changes save staff and tenant time doing repeated, changing calculations that do not significantly change tenants' situations. Staff time/admin cost savings allows more time to work with tenants and explore new projects. Anticipate tenants having increased housing choice due to clarity in understanding household funds needed for housing. Allows for landlords to understand household rent responsibilities. Reduces the need for staff to calculate housing feasibility.

7. Describe the impact on the agency's ability to meet the MTW statutory requirements;

None expected

8. Describe the impact on the rate of hardship requests and the number granted and denied as a result of this activity; and

No significant change expected due to total package of complimentary and offsetting changes. Hardship policy is in place to protect those who need it, such as the few families affected by losing certain deductions. Agency will track and document hardship requests so as to adjust program design, better clarify requirements, or clear up misunderstandings for participants if necessary.

9. Across the other factors above, describe the impact on protected classes (and any associated disparate impact)

Elderly/disabled households protected from disparate impact by increased standard deduction and hardship policy.

Rent Policy Waiver – Examples of Impacts

			Deductions (allowances & expenses)	Adjusted Annual Income (subtract deductions)	Adjusted Monthly Income	Total Tenant Payment Percent of Income	Total Tenant Payment (rounded)	
Disabled Single Person Family	Monthly Income \$794	Current	\$400	\$9,128	760.67	30%	\$228	Monthly change: \$6 increase
	Annual Income (monthly x 12) \$9,528	MIW	\$1,500	\$8,028	669.00	35%	\$234	

			Deductions (allowances & expenses)	Adjusted Annual Income (subtract deductions)	Adjusted Monthly Income	Total Tenant Payment Percent of Income	Total Tenant Payment (rounded)	
Elderly Family	Monthly Income \$1,424	Current	\$400	\$16,688	1390.67	30%	\$417	Monthly change: \$38 increase
	Annual Income (monthly x 12) \$17,088	MIW	\$1,500	\$15,588	1299.00	35%	\$455	

Rent Policy Waiver – Examples of Impacts

			Deductions (allowances & expenses)	Adjusted Annual Income (subtract deductions)	Adjusted Monthly Income	Total Tenant Payment Percent of Income	Total Tenant Payment (rounded)	
Adult + 1 minor dependent	Monthly Income \$944	Current	\$480	\$10,848	904	30%	\$271	Monthly change: \$45 increase
	Annual Income (monthly x 12) \$11,328	MIW	\$480	\$10,848	904	35%	\$316	

			Deductions (allowances & expenses)	Adjusted Annual Income (subtract deductions)	Adjusted Monthly Income	Total Tenant Payment Percent of Income	Total Tenant Payment (rounded)	
Disabled Single (no medical expenses)	Monthly Income \$777	Current	\$400	\$8,942	743.67	30%	\$223	Monthly change: \$5 increase
	Annual Income (monthly x 12) \$9,324	MIW	\$1,500	\$7,824	652.00	35%	\$228	

Rent Policy Waiver – Examples of Impacts

			Deductions (allowances & expenses)	Adjusted Annual Income (subtract deductions)	Adjusted Monthly Income	Total Tenant Payment % of Income	Total Tenant Payment (rounded)	
Adult with 3 Dependent Minors, no childcare	Monthly Income \$2,200	Current	\$1,400	\$24,960	\$2,080	30%	\$624	Monthly change: \$104 increase
	Annual Income (monthly x 12) \$26,400	MTW	\$1,400	\$24,960	\$2,080	35%	\$728	

			Deductions (allowances & expenses)	Adjusted Annual Income (subtract deductions)	Adjusted Monthly Income	Total Tenant Payment % of Income	Total Tenant Payment (rounded)	
2 Adults + 4 Dependent Minors, no childcare expenses	Monthly Income \$1,500	Current	\$1,920	\$16,080	\$1,340	30%	\$402	Monthly change: \$67 increase
	Annual Income (monthly x 12) \$18,000	MTW	\$1,920	\$16,080	\$1,340	35%	\$469	

MTW

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Rent Policy Waiver – Examples of Impacts

			Deductions (allowances & expenses)	Adjusted Annual Income (subtract deductions)	Adjusted Monthly Income	Total Tenant Payment % of Income	Total Tenant Payment (Higher of % Income or MINIMUM RENT)	
Zero Income Family	Monthly Income \$0	Current	\$0	\$0	\$0	30%	\$50	Monthly change: \$50 increase
	Annual Income (monthly x 12) \$0	MTW	\$0	\$0	\$0	35%	\$100	

- Increased elderly/disabled deduction (from \$400 to \$1,500) greatly offsets the impact of rent changes on most elderly/disabled households
- Rent changes for other families are balanced by reduced certification frequency: increases in income will not trigger a subsequent Interim to increase rent portion
- Hardship waivers will be put in place to specify when & how to make exceptions to

MTW

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Rent Policy Waiver – Examples of Impacts

			Deductions (allowances & expenses)	Adjusted Annual Income (subtract deductions)	Adjusted Monthly Income	Total Tenant Payment % of Income	Total Tenant Payment (rounded)	
1 Adult with 2 Dependent Minors, childcare deduction	Monthly Income \$1,800	Current	\$2,400	\$19,197	\$1,600	30%	\$480	Monthly change: \$122 increase
	Annual Income (monthly x 12) \$21,597	MTW	\$960	\$20,637	\$1,720	35%	\$602	
1 Adult with 1 Dependent Minor, childcare deduction	Monthly Income \$2,109	Current	\$3,080	\$22,223	\$1,852	30%	\$556	Monthly change: \$92 increase
	Annual Income (monthly x 12) \$25,303	MTW	\$480	\$24,823	\$2,069	35%	\$648	

MTW

Rent Policy Waiver – Examples of Impacts

Activity 1s – Elimination of Unreimbursed Childcare Deduction

HRHA has 23 families claiming a daycare expense out of 806 total families.

Of those 23 families:

- 5 receive assistance thru DSS for daycare expenses;
- 1 is a disabled family. The new deduction for disabled families HRHA is proposing is greater than the expense being paid in daycare, so rent will go down for this family;
- for most remaining families, the new combined utility allowance will increase and help offset the removal of the childcare deduction;
- for any remaining families, a hardship waiver is available for the expense.

Impact Analysis

Activity

2.b. - Payment Standards – Fair Market Rents (HCV)
 Raise 1BR payment standard to 120%
 Raise 1BR accessible unit payment standard to 140%

1. Describe the activity's impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)

HAP expenses will increase, but HRHA will manage the increase through enhanced utilization and use of proposed rent offsets. Agency's 1BR voucher value will increase from the current \$773 per month to \$843 (120%) and \$984 (140%). With 393 1BR unit vouchers leased now out of 431 total, 38 searching for a 1BR unit, and 581 total households on the 1BR waiting list, this attempt to increase housing choice and number of accessible units is necessary in our tight rental market. The expense increase is anticipated to be offset by the proposed increase in minimum rent from \$50.00 to \$100.00 and increase in tenant responsibility from 30% to 35%.

2. Describe the activity's impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs);

HRHA's initial analysis identified a potential \$6.00 increase to one bedroom households. The increase, although not significant, is anticipated to be minimized by the proposed triennial recertification process. This change is not expected to impact households' overall budget. It will increase housing choice: by covering more rental cost HRHA expects households to have more choice of scarce available 1BR units and 1BR accessible units. The activity will increase access and utilization while reducing housing search time for 1BR units.

3. Describe the impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist);

Change should help shorten wait list and wait time for hard to find 1BR units, especially when accessible 1BR units become available. Currently 581 households are on the waiting list for 1BR units. An additional 35 voucher holders have been searching for units for an average of 110 days.

4. Describe the 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 impact expected.

Impact Analysis

5. Describe the impact on the agency's current occupancy level in public housing and utilization rate in the HCV program

Expect to increase use of vouchers, especially for hard to serve households.

6. Describe the impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice;

Expect to increase housing choice for 1BR households and especially for those needing accessible units. Increased payment standard should appeal to more landlords.

7. Describe the impact on the agency's ability to meet the MTW statutory requirements;

The proposed increase will support HRHA's ability to meet the MTW statutory requirement by increasing housing choice and cost effectiveness.

8. Describe the impact on the rate of hardship requests and the number granted and denied as a result of this activity; and

No impact expected

9. Across the other factors above, describe the impact on protected classes (and any associated disparate impact)

None expected

Impact Analysis

Activity	<p>3.b. - Alternative Reexamination Schedule for Households (HCV)</p> <p>Recertification once every three years. Interim decreases allowed once per year per household if experience a 20% or more decrease of gross income for household total income.</p> <p>When at zero income there will be a 3-month grace period, then an interim completed with income previously calculated rent if there is no other source of income.</p> <p>Interim when household goes from zero to earning income.</p> <p>Applies to current households. Interim policy applies to everyone right away. Triennials will kick in one year after New Admission for households.</p>
<p>1. Describe the activity's impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)</p>	
<p>Anticipate some increase in HAP expenses due to annual/inflationary rent increases and no corresponding tenant rent share increases. Process costs will be offset by staff and administrative cost savings.</p>	
<p>2. Describe the activity's impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs);</p>	
<p>Anticipate significant benefit to families as well as increased housing choice and self-sufficiency. The triennial certification process will allow households to retain additional earnings and encourage full- and part-time employment options.</p>	
<p>3. Describe the impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist);</p>	
<p>None expected. Families keeping more of their earned income may achieve self-sufficiency more quickly than in the past, opening units and reducing wait times.</p>	
<p>4. Describe the 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);</p>	
<p>No change expected. Possible reduction in termination rate with recertification less often and household keeping income increases for that time.</p>	
<p>5. Describe the impact on the agency's current occupancy level in public housing and utilization rate in the HCV program</p>	
<p>None expected</p>	

Impact Analysis

6. Describe the impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice;

Anticipate the activity will provide a positive impact on achieving MTW goals through cost savings in staff time as well as improved self-sufficiency and housing choice for households. Staff will reallocate the time previously spent on certification to assist in housing search and housing stabilization activities. This activity will improve self-sufficiency and housing choice by allowing households to keep more income between certifications leading to the ability to cover rent without a voucher or save for a rental deposit or homebuyer down payment.

7. Describe the impact on the agency's ability to meet the MTW statutory requirements;

Anticipate that this activity will have the most significant impact on households in assisting them in becoming more self-sufficient. The staff time saved through less frequent certification improves overall program cost effectiveness.

8. Describe the impact on the rate of hardship requests and the number granted and denied as a result of this activity; and

None expected. This change should be an advantage for all households, and households can request an interim certification annually.

9. Across the other factors above, describe the impact on protected classes (and any associated disparate impact)

None anticipated, should be a positive change for households within the protected classes.