

## **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.