

**PHA Name :** Brighton

**PHA Code :** CO019

**MTW Supplement for PHA Fiscal Year Beginning :** (MM/DD/YYYY): 1/1/2026

**PHA Program Type:** HCV Only

**MTW Cohort Number:** MTW Flexibility for Smaller PHAs

**MTW Supplement Submission Type:** Annual Submission

DRAFT

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

This submission is intended to cover FY 2026.

The primary focus for 2026 is MTW statutory objective (2) and increasing self-sufficiency. The primary new tool for 2026 is the implementation of tiered rents. Historically BHA has seen a trend where as the family's income increases and the family share of rent increases alongside it which results in the family being discouraged from either continuing employment or reducing their employment to keep the family share low. The implementation of tiered provides incentive and opportunity for a family to earn more while keeping the increase in family share more palatable to the family's economic situation. MTW activities already adopted provided incentive to non-heads of household to seek or maintain employment, but tiered rents further expands the incentives to the heads of household.

MTW statutory objective (1) -reduce cost and achieve greater cost effectiveness in federal expenditures- is also addressed this year by reducing the need for families to file more frequent interim reexaminations since there is no change to the family share so long as the family's income remains within the tier they are currently paying at.

MTW statutory objective (3) - increase housing choices for eligible low-income families- is supported in 2026 by expanding the flexibility for the PHA to use funding on a greater variety of housing projects either being constructed or rehabilitated. Supporting the construction or rehabilitation of housing inventory will broaden the housing choice opportunities for the local community.

**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).**

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

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

**C. MTW Activities Plan that Brighton Plans to Implement in the Submission Year or Is Currently Implementing**

<b>1.b. - Tiered Rent (HCV)</b>
<p><b>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</b></p> <p>Using a carefully designed table the PHA has developed a set of tiered TTPs for use for in calculating families rent shares. The family's income would be calculated normally under the PHA's current MTW rules and regulations with the family adjusted income falling within a particular range in the table. Within that range, the family's TTP would, instead of being based on the true adjusted annual income, be based on the "low" number found in the tier. The table allows for the benefits getting more pronounced at higher income levels (by means of a larger tier range), this activity can promote self-sufficiency among households. The basic premise for this activity is that the more the family earns the greater the overall impact of this becomes. Families that elect not to increase their income are largely unaffected by this activity but for families that really engage in the tiers, they can become rather pronounced.</p> <p>This activity was designed as an alternative to implementing a work requirement at this time.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Self-sufficiency</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Increased expenditures</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>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.</b></p> <p>This is the first year of implementation.</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>Please describe how the income bands are structured</b></p> <p>As this is a new and rather different method of calculating TTP, the PHA has structured the tiers in a more exponential manner rather than simple linear progression. This resulted in the bands being rather small on the low end of the scale, but they get much larger at higher income levels. This approach left the majority of the currently assisted households with little impact at time of implementation but provides opportunity to progress upwards.</p>
<p><b>Please upload the tiered rent policy table that shows the income bands.</b></p> <p>This document is attached.</p>
<p><b>What is the income basis for assigning households to income bands?</b></p> <p>This activity uses a different definition of income because we are using the following MTW waivers (check all that apply)</p> <p>1.v. and/or 1.w "alternative inclusions and exclusions" (explanation below)</p>

<b>1.j. - Alternative Utility Allowance (HCV)</b>
<p><b>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</b></p> <p>This activity consolidated four utility schedules into just two. This has resulted in greater ease of use and understanding by participants. The schedules retain the bedroom count and utility type factors. The implementation of the simplified schedules has resulted in increased efficiency of administrative burden and greater understanding and use by participants.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Neutral (no cost implications)</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>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.</b></p> <p>The schedules have been fully implemented and there has been no noticeable fiscal impact. After full implementation, the likelihood of administrative error in using the wrong schedule during calculations has been significantly reduced.</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>Please describe the alternative method of calculating the utility allowances. Please explain how the method of calculating utility allowances is different from the standard method and what objective the MTW agency aims to achieve by using this alternative method.</b></p> <p>The calculations are the average of the three units types for families (single family home, duplex, and multi-family). The senior utility allowances are site specific from high energy efficiency projects and are based on average annual usage studies adjusted for annual anticipated cost adjustment factors.</p> <p>The agency will review its schedule of utility allowances each year and revise its allowances for a utility category if there has been a change of 10 percent or more of the cost from the prior year. The agency will maintain information supporting its annual review of utility allowance and any revisions made in its utility allowance schedule.</p> <p>The agency will not include items in the utility schedule that are excluded under HUD regulations.</p>
<b>1.n. - Utility Reimbursements (HCV)</b>
<p><b>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</b></p> <p>This waiver ended utility reimbursements for families. By eliminating UPRs this created a minimum level of self-sufficiency not captured in current regulations. This waiver only affects a household when the utility allowance is greater than the total tenant payment.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness; Self-sufficiency</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p>

Decreased expenditures
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b>  The MTW activity applies to all assisted households
<b>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.</b> The elimination of URPs continues to free up somewhere between \$10,000 -- \$15,000 in annual HAP expenditures. The savings could potentially support the release of an additional voucher.

<b>1.w. - Alternative Income Inclusions/Exclusions (HCV)</b>
<b>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</b> The PHA provides a partial income exclusions for non-head of household (or spouse or cohead) adult members between the ages of 18 and 24 where only 75% of their earned income from employment is used when calculating family share. Historically, this agency has seen adult children cease employment once their income is captured in family share calculations. This is sometimes done since the adult child may drive family share more than the HOH and the household becomes destabilized as the individual members may not contribute at the rate calculated by the PHA. This leaves the HOH oftentimes with the choice of being unable to collect the increased rent share from the adult member or forcing the adult member to cease employment to return the family share to the prior lower level. The partial exclusion preserved the young adults desire to work and build job history and financial resources for establishing an independent unassisted household while still permitting the PHA to capture a majority of the new income when calculating family share.  The PHA has an income exclusion for family members receiving SSI and are employed. This replaces EID for family members receiving SSI. The PHA excludes 50% of the earned employment income from any family member that is receiving SSI. This activity is designed to support self-sufficiency for disabled recipients of SSI that are earning wages in addition to SSI or seek to transition to full employment status.
<b>Which of the MTW statutory objectives does this MTW activity serve?</b>  Self-sufficiency
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b>  Increased revenue; Increased expenditures
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b>  The MTW activity applies only to a subset or subsets of assisted households
<b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b>  New admissions and currently assisted households
<b>Does the MTW activity apply to all family types or only to selected family types?</b>  The MTW activity applies only to selected family types
<b>Please select the family types subject to this MTW activity.</b>  Disabled families (to the extent those families are not exempt via a reasonable accommodation); Other – another

specifically defined target population or populations.

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

The target population for the first described activity above is non-head of household (or spouse or cohead) adult family members between the ages of 18 and 24.

The target population for the second described activity is permitted under HUD clarification that PHAs have been approved to exclude income from assets for elderly and disabled. This allows the PHA to apply its overall activity (the second described activity) to all program participants.

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

The MTW activity applies to all tenant-based units

**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.**

Although there is the potential for increased expenditures, the PHA has experienced no significant change in HAP expenses since family members benefitting from the exclusions may not work otherwise. Capturing either 75% or 50% of the family member's income is still an overall gain for both the PHA and family as opposed to capturing 100% of \$0 in income from covered family members. This activity has been received favorably.

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

No

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

The first activity: Exclusion of 25% of earned income by non-head of household (or spouse or cohead) adult family members between the ages of 18 and 24. This activity is clarified to have the exclusion terminate at the first examination (interim or annual) following the family members attainment of their 24th birthday.

The second activity: Exclusion of 50% of earned income for individuals receiving SSI.

For family members covered by multiple MTW Alternative Income Exclusion waivers adopted by the PHA, the family member would only receive the single, most generous benefit. (i.e. benefits do not stack - if the family member could receive a 25% exclusion under the first activity and a 50% exclusion under the second activity, only the 50% would apply. An if that family member were also a student, the student income exclusion would override the 50% as well and the member would simply receive the standard HUD student exclusion as it provides the most benefit of the three.)

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

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

The PHA implementing the option to apply the current year payment standard at any time after the effective date of the new amount with the payment standard increases. Applying the new increased payment standard after the effective date, instead of at the household's first regular reexamination after the effective date of the new payment standard, will reduce the number of households who may be rent burdened otherwise. This MTW flexibility is important due to the PHA's



adoption of triennial reexaminations of elderly and disabled households. In addition, without this flexibility the family may be forced to move to a different unit to secure the increased payment standard. With this flexibility the elderly or disabled household can remain in their current unit.

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

Self-sufficiency; 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 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 all tenant-based units

**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.**

The payment standards are set according to normal policy - between 90% and 110% of FMR. This activity only affects when the increased payment standard is applied to the family. If an elderly or disabled family is subject to a rent increase that would put the family share above 30%, then the family receives the increased payment standard that is currently effective instead of at the family's next normally occurring triennial reexamination. The interim adjustment which applies the increased payment standard occurs at the same time the contract rent increase goes into effect.

**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.

**Please explain the payment standards by FMR:**

The payment standards follow the normal regulations and are set between 90% of FMR and 110% of FMR. The only change is to the effective date for the application of the increased payment standard.

#### 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**

The PHA operates in a smaller jurisdiction and getting a qualified third-party to review and approve the few numbers of properties the PHA would need is not cost or time effective. In addition, the PHA routinely underprices their directly owned units to remain affordable. The overwhelming majority of units at PHA-controlled properties are either LIHTC and not subject to rent reasonableness or RAD units and are simply indexed to the OCAF.

**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.**

The PHA has saved time and expenses under the activity. There is no longer the cost of securing a third-party and the lease-up and rent increase approval process time has been significantly reduced.

**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 PHA will employ a third party to review a sample (25%) of the required annual rent reasonableness determinations covered by this activity. If the review reveals a non-reasonable rate greater than 5% of the sample, the PHA shall have the third-party review 100% of the rent reasonableness determinations covered by this activity.

No document is attached.

**Please explain or upload a description of the rent reasonableness determination method.**

The PHA uses software from a nationally known and recognized third-party provide (Nelrod). The provider uses available market data to generate a set of comparable units for each rent reasonableness determination. The guidelines established with the software provider conform to the HUD requirements outlined in 24 CFR 982.305 and 24 CFR 982.507.

No document is attached.

#### 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**

In an effort to reduce administrative burden on the families and PHA staff, elderly and disabled households moved to a

recertification schedule every three years. Changes in these households are usually limited to annual Social Security COLA increases which are typically not cost or time effective to capture on an annual basis.

Notwithstanding the expanded ability to file more than one interim per year under the current PHA Administrative Plan, the PHA shall not restrict MTW safe harbor and will allow at least one interim adjustment per year at the request of the household, if the household income has decreased 10% or more.

**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 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 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 all tenant-based units

**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?**

No
No document is attached.
<b>What is the recertification schedule?</b>
Once every three years
<b>How many interim recertifications per year may a household request?</b>
2 or more
<b>Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.</b>
<p>The PHA will conduct an interim reexamination of the household at the family's request, if the household adds or removes any household members.</p> <p>The triennial reexamination schedule shall only apply to households who consist entirely of elderly or disabled members who are on a fixed income or derive income from fully excluded sources under current regulation.</p> <p>In addition, the PHA allows at least one interim adjustment per year at the request of the household, if the household's gross income has decreased 10% or more.</p>

<b>3.d. - Self-Certification of Assets (HCV)</b>
<b>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</b>
Families self-certify assets under \$25,000 on an on-going basis. More than 95% of the families served on the program have less than \$5,000 in assets and it is extremely rare to have a household with greater than \$25,000 in assets. The families and PHA staff used to spend considerable time and effort in certifying those asset which would only in exceptional cases generate more than \$100/year in income. PHA staff time and resources are better spent on other functions than verifying inconsequential assets.
<b>Which of the MTW statutory objectives does this MTW activity serve?</b>
Cost effectiveness
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b>
Decreased expenditures
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b>
The MTW activity applies to all assisted households
<b>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.</b>
It has been estimated that the PHA used to spend time and resources capturing maybe \$200 program-wide in asset income. This loss in reported asset revenue is more than offset by the saving of staff time and resources.
<b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b>
No
<b>Please state the dollar threshold for the self-certification of assets.</b>

\$25,000.

#### 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**

The PHA is authorized to conduct its own HQS inspections for units owed, controlled, or managed by the PHA. This agency is a smaller jurisdiction and securing a qualified, reliable third-party inspection proved to be costly or time-consuming to execute. Without a reliable third-party inspection families faced delays in occupancy.

Families can still request an interim inspection.

HQS standards have not been altered as found in 24 CFR 982.401.

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

Cost effectiveness; Housing choice

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

Families no longer face a delay in getting an inspection and can lease-up or begin assistance faster.

**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

Although the PHA is no longer subject to SEMAP, the PHA utilizes a third-party inspector to perform what were previously required SEMAP HQS QC inspections. Failed HQS QC inspections greater than 10% result in all PHA-owned, managed, or controlled units being re-inspected. The family can also request a third-party inspection in case of complaint or interim inspections.

No document is attached.

#### 9.a. - Increase PBV Program 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**

Since the local rental market is tight, the PHA was previously authorized to project-base up to 50% (or the lower of either the total authorized units or annual budget authority). This activity has not been utilized but remains an option if success rates for voucher holders falls and jeopardizes the overall utilization of the HCV program.

<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Housing choice</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Neutral (no cost implications)</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>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.</b></p> <p>Since no PBVs were utilized in the prior year there is no fiscal impact at this time.</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>What percentage of total authorized HCV units will be authorized for project-basing?</b></p> <p>50.00%</p>

<p><b>9.b. - Increase PBV Project Cap (HCV)</b></p>
<p><b>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</b></p> <p>Increasing the PBV project cap provides another toll to develop or support affordable housing options. Although this activity was previously approved it has not been utilized at this point.</p> <p>The PHA remains subject to Notice PIH 2013-27 where applicable, or successor.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Housing choice</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Neutral (no cost implications)</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>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.</b></p> <p>As no new PBVs were implemented last year there is no fiscal impact.</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>

**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**

Historically, the PHA has had extremely limited responses to the PBV Selection Process. This activity was previously approved and allows the PHA to seek out qualified, proven partners to develop PBV projects. Having a reliable, knowledgeable developer increases the likelihood of projects coming to fruition.

**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.**

6 PBV's were awarded in 2025 to Hughes Station Apartments. BHA was able to award these PBV's expeditiously, through an independent entity as a result of this waiver.

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

No

**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**

The PHA wants to encourage the establishment of strong community ties to the jurisdiction. Vested interest in the community helps to create longer-term stability through engagement of schools, employment, religious organizations, community groups, or civic participation. Limiting portability by delaying choice mobility until two years have elapsed since admission helps strengthen those ties between the participant and the community.

The PHA has a clear and uniform policy in place to address how move requests are received and how they are approved or denied for PBV households.

Participants still retain the ability to request a tenant-based voucher for reasonable accommodation according to existing rules.

**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.**

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 (i.e., applicants) only

**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.**

This only applies to non-resident admissions of PBV families.

**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.**

There have been no non-resident admission to the PBV program in the last year so there was no fiscal impact.

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

No

#### **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**

The PHA was previously authorized to allocate up to 10% of its HAP budget on service provisions. Activities supported by the service provision include, but are not strictly limited to:

Housing navigation which focuses on supporting families with housing needs and expanded services including possible homeownership navigation. These services address the housing continuum to move the local community towards long-term housing stability.

Career and College Launch (CCL) which involves community partnerships to assist high school and middle school students to investigate financial aid, explore post secondary school and program options, and internship opportunities.

Food assistance programs the PHA supports in partnership with local and regional food banks. Activities include the delivery and distribution of commodities to elderly and near-elderly families at the community's senior independent living projects. There are also efforts to expand enrollment in the partner programs and increase community impact on addressing food scarcity among low-income vulnerable populations.

Case management for Tenant-based Rental Assistance (TBRA) programs. The county-funded TBRA program operates as a testing and refinement opportunity for the PHA to gain experience in running a short-term rental assistance program and transitioning families into market housing. The case management activities are not just limited to the TBRA program but can be deployed as a support for HCV programs and assistance services to target low-income vulnerable populations in general. The PHA operates several different grant that have program funding but very little funding to build out the supportive services that are needed to make sure the initiatives are successful.



<p>The service provision supports the establishment and on-going operations of a remote site separate and distinct from the general PHA offices which offers a variety of community services in conjunction with local and regional partners.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Self-sufficiency; Housing choice</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Increased expenditures</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>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.</b></p> <p>The PHA utilized \$75,000 in 2024 and is projected to use roughly \$75,000 in 2025 to support the various service programs. That funding allowed the PHA to continue services that would have otherwise been discontinued or drastically scaled back.</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>What types of services is the MTW agency providing?</b></p> <p>Housing search and navigation. Preparatory services for students for post-high school opportunities. Food assistance. Case management. Clothing and basic necessity partnerships.</p> <p>The agency will not spend more that 10% of its HAP budget on local, non-traditional activities. Families receiving housing or services through local, non-traditional activities must meet the HUD definition of low-income. The PHA is subject to Notice PIH 2100-45 or any successor notice and/or guidance. The PHA will comply with Section 30 of the 1937 Housing Act.</p> <p>Any MTW funding awarded to a third-party must be competitively bid.</p>
<p><b>How many households did the PHA provide services to in the most recently completed PHA Fiscal Year through this activity?</b></p> <p>1,278</p>
<p><b>Does the MTW activity apply to all LNT units/properties?</b></p> <p>The MTW activity applies to all units/properties</p>
<p><b>Are any families receiving services only (i.e., services only and no housing assistance provided by the PHA)?</b></p> <p>Yes</p>
<p><b># of persons receiving LNT services only in the most recently completed PHA fiscal year.</b></p> <p>3,603</p>

<p><b>17.c. - Housing Development Programs</b></p>
<p><b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW</b></p>

**activity contributes to a larger initiative**

The PHA plans to use MTW funding to acquire, renovate, and/or build affordable units for low-income families that are not public housing units. Eligible activities include: gap financing for non-PHA development of affordable housing, development of project-based units, or tax credit partnerships.

The PHA has identified the projects known as Hughes Station Apartments, Ravensfield, and Adams Point as projects which received may receive funding from this flexibility. These projects are scheduled for rehabilitation or are new construction and will provide affordable units for low-income families. RAD Phase II was completed in a prior fiscal year.

The agency will not spend more than 10% of its HAP budget on local, non-traditional activities.

Families receiving housing or services through local, non-traditional activities will meet the HUD definition of low-income.

The agency is subject to Notice PIH 2011-45 or any successor notice and/or guidance.

Agency will comply with section 30 of the 1937 Housing Act.

Any MTW funding awarded to a third-party provider will be competitively bid.

**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

**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.**

The Hughes Station Apartments benefited from receipt of funds under this waiver and a renovation of the project is projected to be completed in early 2026. Without the financial support under this waiver the project may not be on-track to be completed which impacts the availability of 120 affordable units.

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

No

**Table 17.c.1 - Housing Development Programs that the MTW Agency plans to commit Funds to in Fiscal Year**

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Hughes Station Apartments	Rehabilitation	Gap financing, other	120.00	120.00	0.00	51.00	18.00	51.00
Ravenfield	New Construction	Gap financing, tax credit partnership, other	46.00	46.00	0.00	0.00	0.00	46.00
Adams Point	New Construction	Gap financing, tax credit partnership, other	92.00	92.00	0.00	0.00	0.00	92.00

### Housing Development Programs that the MTW Agency plans to spend funds on in the Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Hughes Station Apartments	Rehabilitation	Gap financing, other	120.00	120.00	0.00	51.00	18.00	51.00
Ravenfield	New Construction	Gap financing, tax credit partnership, other	46.00	46.00	0.00	0.00	0.00	46.00
Adams Point	New Construction	Gap financing, tax credit partnership, other	92.00	92.00	0.00	0.00	0.00	92.00

**Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year**

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Hughes Station Apartments	Rehabilitation	Gap financing, other	120.00	120.00	0.00	51.00	18.00	51.00

### Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Hughes Station Apartments	Rehabilitation	Gap financing, other	120.00	120.00	0.00	51.00	18.00	51.00
Brighton RAD II	Rehabilitation	None	13.00	13.00	0.00	0.00	0.00	13.00

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

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>
<b>E.1</b>	<p><b>Agency-Specific Waiver(s) for HUD Approval:</b></p> <p>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.</p> <p>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.</p> <p>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.</p> <p><b>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</b></p> <p>No</p>

E.2	<p><b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b></p> <p><b>Does the MTW agency have any approved Agency-Specific Waivers?</b> No</p>

<b>F.</b>	<b>Public Housing Operating Subsidy Grant Reporting.</b>
<b>F.1</b>	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.

<b>Federal Fiscal Year (FFY)</b>	<b>Total Operating Subsidy Authorized Amount</b>	<b>How Much PHA Disbursed by the 9/30 Reporting Period</b>	<b>Remaining Not Yet Disbursed</b>	<b>Deadline</b>
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<b>G.</b>	<b>MTW Statutory Requirements.</b>	
<b>G.1</b>	<b>75% Very Low Income – Local, Non-Traditional.</b> 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.	
<b>Income Level</b>		<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
80%-50% Area Median Income		
49%-30% Area Median Income		
Below 30% Area Median Income		
Total Local, Non-Traditional Households		<b>0</b>

\*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.

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>
<b>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?</b> Yes	

<b>G.3</b>	<b>Substantially the Same (STS) – Local, Non-Traditional.</b>
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?
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<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>
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.
No known evaluations.	