

PHA Name : Washington County (MN)

PHA Code : MN212

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

PHA Program Type: Combined

MTW Cohort Number: MTW Flexibility for Smaller PHAs

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The Washington County CDA 2024 MTW plan is to continue with the changes made outlined in the 2022 plan. With the number of program changes coming through the Housing Opportunity through Modernization Act of 2016 (HOTMA) it has been the decision of the CDA to first implement those changes before making any additional MTW plan changes to the program.

Through the Resident Advisory Board and additional MTW tenant meetings, the CDA learned that any changes to the program make participants uneasy and need to be done thoughtfully and communicated openly. With the number of changes coming through with HOTMA, we do not want to overwhelm participants with additional MTW changes. The CDA has also learned since becoming an MTW agency, as a small agency in a metro area where most of our tenants are port-in's, changes to standing policies are difficult to communicate to both PHA's and participants moving to Washington County.

The 2022 Plan included small changes that could be implemented without huge adjustments for participants and staff. The changes that have been implemented include the goals of efficiency, cost effectiveness, and increasing housing options for low-income families.

- Increasing maximum rent to 50% at move-in. Since January 2022 four families have used the increased maximum rent to move into the county. This flexibility gave these families the opportunity to move into safe, decent housing with opportunities for jobs and for children to attend quality schools. Rents have continued to increase over the past year making it harder and harder for voucher holders to find housing. This gives voucher holders the same opportunities as non-assisted tenants.
- Self-certification of assets under \$50,000. Staff save time trying to gather asset information yearly.
- Rent reasonableness on CDA owned properties. Using a third-party system for rent reasonableness on all units has saved time and money for the CDA. Quality assurance test is done to assure the third-party system is accurate.
- Self-certification for initial move-in inspection. The landlord self-certification of non-life-threatening deficiencies at move-in has been working well, eliminating delays for starting rent payment due to inspections.
- Conducting inspections on CDA owned buildings. The Housing Assistance department has been conducting HQS inspections on CDA owned buildings since September 2022. The same standards are used for all units inspected with no differential treatment for CDA owned buildings. The CDA uses an outside management company giving a degree of separation between inspectors and property management. No concerns have been raised by tenants to date.

The CDA will continue to explore additional options for change after the implementation of HOTMA.

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

1. Tenant Rent Policies	
o. Initial Rent Burden (HCV)	Currently Implementing
v. Alternative Income Inclusions/Exclusions (PH)	Currently Implementing
w. Alternative Income Inclusions/Exclusions (HCV)	Currently Implementing
2. Payment Standards and Rent Reasonableness	
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing
3. Reexaminations	
c. Self-Certification of Assets (PH)	Currently Implementing
d. Self-Certification of Assets (HCV)	Currently Implementing
4. Landlord Leasing Incentives	
5. Housing Quality Standards (HQS)	
c. Third-Party Requirement (HCV)	Currently Implementing
6. Short-Term Assistance	
7. Term-Limited Assistance	
8. Increase Elderly Age (PH & HCV)	
9. Project-Based Voucher Program Flexibilities	
10. Family Self-Sufficiency Program with MTW Flexibility	
11. MTW Self-Sufficiency Program	
12. Work Requirement	
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
14. Moving on Policy	
15. Acquisition without Prior HUD Approval (PH)	
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	

C. MTW Activities Plan that Washington County (MN) Plans to Implement in the Submission Year or Is Currently Implementing

1.o. - Initial Rent Burden (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 Agency increased the maximum family rent share to 50% on initial lease up. Increasing the initial rent burden gives families greater choice when moving in or into Washington County. Washington County has excellent schools, employment opportunities, and safe neighborhoods for families. This initiative gives voucher holders the same opportunities as non-assisted tenants.
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.

The policy has been in place for about a year and has allowed five families the opportunity to move into Washington County that would not have had this choice without the change. The policy has not changed during implementation and is working well.

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.

The Safe Harbor allows the Agency to increase the family share of rent at initial occupancy to 50% of families income meeting the Safe Harbor of not to exceed 60%.

Does the MTW activity require an impact analysis?

Provided Already

If the MTW agency plans to implement a new maximum income-based rent percentage (higher than 40% of adjusted monthly income), what is that maximum?

50.00%

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

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

The Agency will allow self-certification of assets of less than \$50,000. In addition, the Agency will not include any income from those same assets in the calculation of the tenant rent portion. By allowing self-certification, this meets the goal of being more efficient and decreasing staff time.

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 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.

For annual recertification, tenants are no longer required to submit asset information. Tenants sign a self-certification that they have assets less than \$50,000. Staff save time trying to receive information from tenants. No changes have been made to policy since implementation.

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?

Income from assets less than \$50,000 will be excluded from the tenant rent calculation

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

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

The Agency will allow self-certification of assets of less than \$50,000. In addition, the Agency will not include any income from those same assets calculation of the tenant rent portion. This policy meets the objective of being more efficient.

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 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.

For annual recertification, tenants are no longer required to submit asset information. Tenants sign a self-certification that they have assets less than \$50,000. Staff save time trying to receive information from tenants. No changes have been made to policy since implementation.

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?

Income from assets less than \$50,000 will be excluded from the tenant rent calculation

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 Agency performs rent reasonable determinations on all HCV units including in buildings owned by the Agency using a third party software system. Prior to implementing this initiative, the Agency utilized two different systems to provide rent reasonable determinations. This activity has allowed the Agency to only use one system saving time and money on two different methods of determining reasonable rent.

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.

One third party software system is being used for all rent reasonable determinations including on Agency owned properties. The Agency no longer contracts with two different agencies to provide this service. Quality Assurance is being performed on 5% monthly of all determinations.

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.

The Safe Harbor allows the Agency to use the same software on rent reasonable determinations for Agency owned properties.

Please explain or upload a description of the quality assurance method.

The department director conducts quality assurance reviews on 5% of the rent reasonableness determinations monthly and tracks results.

No document is attached.

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

The Agency contracts with AffordableHousing.com, a nationwide firm to do rent reasonableness data collection. The Agency uploads the local unit into the software and it produces the rent reasonableness determination. A copy of the determination is included in the tenant file.

No document is attached.

3.c. - Self-Certification of Assets (PH)

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

The Agency accepts self-certification of assets up to \$50,000

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.

Neutral (no cost implications)

<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>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.</p> <p>Tenants are able to self-certify assets eliminating the need to collect bank statements and other asset documentation.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>Yes</p>
<p>What is the status of the Safe Harbor Waiver request?</p> <p>The waiver was previously approved.</p>
<p>Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.</p> <p>The Safe Harbor supports the agency goal of using self-certification of assets.</p>
<p>Please state the dollar threshold for the self-certification of assets.</p> <p>\$50,000.</p>

<p>3.d. - Self-Certification of Assets (HCV)</p>
<p>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</p> <p>The Agency accepts self-certification of assets up to \$50,000</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>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.</p> <p>Tenants are able to self-certify assets eliminating the need to collect bank statements and other asset documentation.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>Yes</p>
<p>What is the status of the Safe Harbor Waiver request?</p> <p>The waiver was previously approved.</p>
<p>Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.</p> <p>The Safe Harbor supports the agency goal of using self-certification of assets.</p>
<p>Please state the dollar threshold for the self-certification of assets.</p>

\$50,000.

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 Agency will conduct HQS on units owned by the housing authority. The Agency has a third party management company that provides property management including maintenance services offering a degree of separation between the inspector and property manager. The activity is cost effective, eliminating the need to contract with an outside person or agency to conduct inspections on Agency owned properties. This activity also gives the Agency access to units and better monitor conditions of the properties.

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.

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.

Inspections are being completed in all HCV assisted unites eliminating the need for another agency to complete inspections on Agency owned units.

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.

The waiver supports the goal of implementing this activity and allows the agency to conduct inspections on Agency owned units.

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

Following will explain the quality assurance method
The inspection standards will not be altered and will be available for review. Quality assurance inspections will be conducted by a different inspector. If the department receives a request, the CDA will obtain the services of a third-party entity to determine if the CDA owned unit passes HQS.

No document is attached.

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

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</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>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p>No Agency-Specific Waivers are being requested.</p>
E.2	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>Does the MTW agency have any approved Agency-Specific Waivers?</p> <p>Yes</p> <p>Has there been a change in how the waiver is being implemented from when it was originally approved?</p> <p>No</p>

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
----------------------------------	--	--	------------------------------------	-----------------

G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
	80%-50% Area Median Income	
	49%-30% Area Median Income	
	Below 30% Area Median Income	
	Total Local, Non-Traditional Households	0

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

G.2	Establishing Reasonable Rent Policy.

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

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

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?

G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.	
	Occupied Number of Local, Non-Traditional units by

Family Size:	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.	