

PHA Name : Charleston/Kanawha Housing Authority

PHA Code : WV001

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 4/1/2026

PHA Program Type: Combined

MTW Cohort Number: Stepped and Tiered Rent

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

Participation in the MTW Program allows CKHA to develop local solutions to address housing and self-sufficiency barriers in the community. CKHA's goals are to simplify administrative burden, create a stronger financial incentive for families to increase their income, continue to provide a safety net for families that cannot readily increase their income, and minimize increases in CKHA's average housing subsidy expenditure per family.

CKHA's first Annual Supplement for the fiscal year beginning April 1, 2023, included waivers focusing on participating in the MTW Demonstration Study related to Rent Reform via Tiered Rent. Additionally, to decrease burden on both staff and residents, increasing the limit for self-certification of assets for all residents and voucher participants, using an alternative utility allowance for voucher participants, and waiving the third-party requirement for both HQS inspections on PBV units that CKHA owns, manages or controls, and determination of rent reasonableness.

Since then, waivers were added allowing CKHA to increase housing choices by increasing PBV rent to owner up to 120%, establishing and implementing payment standards based on 120% of Fair Market Rents (FMR), allow elderly/disabled households to complete reexaminations triennially rather than annually, and creating an alternate structure for securing local resources to support a Family Self-Sufficiency Program with MTW flexibilities.

CKHA has been approved to modify the terms of the FSS Contract of Participation to be five years from the date of enrollment, unless an approved extension is granted, and to waive the requirement to provide a tenant-based voucher after residing in a PBV for 12 months, extending the time frame to 24 months; this limitation will not apply to portability moves that are justified under laws and regulations applicable to the federal Violence Against Women Act and/or those that support a reasonable accommodation. Currently assisted households will not be impacted.

For the current supplement, CKHA is requesting to simplify reporting and verification of income by excluding grants and school funding of any kind for full or part-time students, including only earned income. For any new FSS enrollments, CKHA is requesting that the start date will be the actual day of the completion of the Contract of Participation (CoP) with enrollment signatures rather than the first of the following month. If the CoP is ended for any reason other than the participants failure or refusal, without good cause, to comply with the terms of the CoP, the contract will be considered nullified rather than terminated, and the FSS escrow funds earned up to that date will be distributed to the family.

CKHA is submitting two Agency-Specific Waivers. The first is a modification of a current agency waiver – Income Verification for Tiered Rent Households – Revised for when there is no access to EIV. When there is no access to EIV, the next level will be tenant-provided documents (including pay stubs) and then tenant self-certification. This process revises the currently approved process, which is EIV to self-certification.

The second Agency-Specific Waiver is requesting to extend the HAP contract execution period from 60 days to 90 days in order to allow leeway for those landlords that have a difficult time submitting the contract within the 60-day time frame without having a negative impact on the tenant.

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).

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| 1. Tenant Rent Policies | |
| a. Tiered Rent (PH) | Currently Implementing |
| b. Tiered Rent (HCV) | Currently Implementing |
| j. Alternative Utility Allowance (HCV) | Currently Implementing |
| r. Elimination of Deduction(s) (PH) | Currently Implementing |
| s. Elimination of Deduction(s) (HCV) | Currently Implementing |
| v. Alternative Income Inclusions/Exclusions (PH) | Plan to Implement in the Submission Year |
| w. Alternative Income Inclusions/Exclusions (HCV) | Plan to Implement in the Submission Year |
| 2. Payment Standards and Rent Reasonableness | |
| b. Payment Standards- Fair Market Rents (HCV) | Currently Implementing |
| d. Rent Reasonableness – Third-Party Requirement (HCV) | Currently Implementing |
| 3. Reexaminations | |
| a. Alternative Reexamination Schedule for Households (PH) | Currently Implementing |
| b. Alternative Reexamination Schedule for Households (HCV) | Currently Implementing |
| c. Self-Certification of Assets (PH) | Currently Implementing |
| d. Self-Certification of Assets (HCV) | Currently Implementing |
| 4. Landlord Leasing Incentives | |
| 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 | |
| b. Increase PBV Project Cap (HCV) | Currently Implementing |
| g. Increase PBV Rent to Owner (HCV) | Currently Implementing |
| h. Limit Portability for PBV Units (HCV) | Currently Implementing |
| 10. Family Self-Sufficiency Program with MTW Flexibility | |
| b.PH Alternative Structure for Establishing Program Coordinating Committee (PH) | Currently Implementing |
| b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV) | Currently Implementing |
| d.PH Modify or Eliminate the Contract of Participation (PH) | Currently Implementing |
| d.HCV Modify or Eliminate the Contract of Participation (HCV) | Currently Implementing |
| 11. MTW Self-Sufficiency Program | |
| 12. Work Requirement | |
| 13. Use of Public Housing as an Incentive for Economic Progress (PH) | |
| 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 Charleston/Kanawha Housing Authority Plans to Implement in the Submission Year or Is Currently Implementing

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| 1.a. - Tiered Rent (PH) |
| <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>See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.</p> <p>As part of the cohort-specific Rent Reform study, CKHA has implemented a tiered rent policy for certain households.</p> |

Qualifying families were randomly selected to either pay under the current (standard) or the new (tiered) rent policy. Under the tiered rent policy, families pay rent based on a rent schedule within tiers of \$2,500. The rent paid by the family is based on 28% of the midpoint of the income tier corresponding to the family income. Income is calculated based on gross income for the prior 12-month period for existing households and the current income for newly admitted households. Existing households whose current income is at least one tier lower than the prior income, or who have extenuating circumstances, may be eligible for a temporary hardship, resulting in a decrease in rent obligation.

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

Cost effectiveness; Self-sufficiency

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

Decreased revenue; Decreased expenditures

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

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

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

Currently assisted households 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.

Non-elderly, non-disabled families

Does the MTW activity apply to all public housing developments?

The MTW activity applies to specific developments

Which developments participate in the MTW activity?

WV001000003 Orchard Manor, WV001000007 Hillcrest/Oakhurst, WV001000008 South Park, WV001000027 CRH LP 1, WV001000028 CRH LP 2, WV001000029 Harris (Rand)/Anderson (Dunbar), WV001000031 CRH LP 3, WV001000032 CRH LP 6, WV001000033 CRH LP 5, WV001000036 Starling Drive, WV001000037 729 Central Avenue, WV001000038 731 Central Avenue

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.

CKHA worked closely with staff from HUD and its research partner, MDRC, to develop the policies and associated procedures and forms to implement the tiered rent study and to train staff. Study enrollment began in March 2023 for households with annual reexamination dates starting in July 2023 and new admissions beginning July 2023 and continued for one calendar year. The triennial recertifications begin in 2026.

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 waivers requested for the study allow CKHA to implement the study as designed by HUD. Safe Harbor Waiver has been previously approved. The safe harbor waivers requested for the study allow CKHA to implement the study as designed by HUD.

Please describe how the income bands are structured.

Income bands are in increments of \$2,500 in annual income. Rents are set at 1/12 of 28% of the midpoint of the tier (representing monthly income), except that households with incomes below \$2,500 will pay a minimum rent of \$50.

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

This document is attached.

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

This activity uses a different definition of income because we are using the following MTW waivers (check all that apply)
1.r. and/or 1.s. "elimination of deductions"

1.b. - Tiered Rent (HCV)

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

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.
As part of the cohort-specific Rent Reform study, CKHA has implemented a tiered rent policy for certain households. Qualifying families were randomly selected to either pay under the current (standard) or the new (tiered) rent policy. Under the tiered rent policy, families pay rent based on a rent schedule within tiers of \$2,500. The rent paid by the family is based on 28% of the midpoint of the income tier corresponding to the family income. Income is calculated based on gross income for the prior 12-month period for existing households and the current income for newly admitted households. Existing households whose current income is at least one tier lower than the prior income, or who have extenuating circumstances, may be eligible for a temporary hardship, resulting in a decrease in rent obligation.

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

Cost effectiveness; Self-sufficiency

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

Decreased revenue; Decreased expenditures

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

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

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

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| Currently assisted households 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. Non-elderly, non-disabled families |
| Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers |
| Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity. This activity will apply to non-elderly, non-disabled under both the tenant-based and project-based voucher programs that were assigned to Tiered Rent. All special purpose vouchers, including VASH, EHV, Shelter Plus Care and Mainstream vouchers will be excluded. |
| 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. CKHA worked closely with staff from HUD and its research partner, MDRC, to develop the policies and associated procedures and forms to implement the tiered rent study and to train staff. Study enrollment began in March 2023 for households with annual reexamination dates starting in July 2023 and new admissions beginning July 2023 and continued for one calendar year. The first triennial recertifications begin in 2026. |
| 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 waivers requested for the study allow CKHA to implement the study as designed by HUD. Safe Harbor Waiver has been previously approved. The safe harbor waivers requested for the study allow CKHA to implement the study as designed by HUD. |
| Please describe how the income bands are structured Income bands are in increments of \$2,500 in annual income. Rents are set at 1/12 of 28% of the midpoint of the tier (representing monthly income), except that households with incomes below \$2,500 will pay a minimum rent of \$50. |
| Please upload the tiered rent policy table that shows the income bands. No document is attached. |
| What is the income basis for assigning households to income bands? This activity uses a different definition of income because we are using the following MTW waivers (check all that apply) |

1.r. and/or 1.s. "elimination of deductions"

1.j. - Alternative Utility Allowance (HCV)

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

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

CKHA utilizes a simplified utility allowance schedule for all unit types, which allows for an easier calculation method for staff and helps families to better understand their rental payments. It is based on the most common structure type, number of bedrooms and a base payment on the most common utilities.

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

Cost effectiveness; Housing choice

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 alternative utility allowance has been implemented and allows for a decreased burden on staff when calculating TTP and discussing with participants the expectations for the amount paid in rent and utilities.

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

No

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.

CKHA has implemented a simplified utility allowance, a single utility schedule for all units and localities. The previous utility schedule consisted of nine localities and five-unit classifications, and the alternative utility schedule uses the most common housing structure and a base payment. The base payment contains the most common utilities, and less common utilities can be add-ons. The objectives are less administrative burden on data entry and maintain the vast amounts of data, less affordability errors when selecting program participants or landlord responsibilities, unit type and locality, and improved communication to program participants and landlords on what a family can afford.

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

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

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

As part of the tiered rent study, families who are selected to pay rent under the tiered rent policy have their rent calculated using gross income from the prior 12 months (except new admissions which had their rent calculated using current gross income). When there are extenuating circumstances that cause significant difficulty to pay the tiered rent, a hardship may be requested.

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

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| <p>what you know today.</p> <p>Increased revenue; Decreased expenditures</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 only to a subset or subsets of assisted households</p> |
| <p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>Currently assisted households only</p> |
| <p>Does the MTW activity apply to all public housing developments?</p> <p>The MTW activity applies to specific developments</p> |
| <p>Which developments participate in the MTW activity?</p> <p>WV001000003 Orchard Manor, WV001000007 Hillcrest/Oakhurst, WV001000008 South Park, WV001000027 CRH LP 1, WV001000028 CRH LP 2, WV001000029 Harris (Rand)/Anderson (Dunbar), WV001000031 CRH LP 3, WV001000032 CRH LP 6, WV001000033 CRH LP 5, WV001000036 Starling Drive, WV001000037 729 Central Avenue, WV001000038 731 Central Avenue</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>CKHA has worked closely with staff from HUD and its research partner, MDRC, to develop the policies procedures and forms to implement the tiered rent study and to train staff. Study enrollment began in March 2023 for households with annual reexamination dates starting in July 2023 and new admissions began July 2023 for one year.</p> |
| <p>Does this MTW activity require a hardship policy?</p> <p>Provided Already</p> |
| <p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p> |
| <p>Does the MTW activity require an impact analysis?</p> <p>Provided Already</p> |
| <p>Which deduction(s) will be eliminated, modified, or added?</p> <p>Dependent allowance; Unreimbursed childcare costs</p> |

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| <p>1.s. - Elimination of Deduction(s) (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>See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.</p> <p>As part of the tiered rent study, families who are selected to pay rent under the tiered rent policy have their rent calculated</p> |
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using gross income from the prior 12 months (except new admissions which had their rent calculated using current gross income). When there are extenuating circumstances that cause significant difficulty to pay the tiered rent, a hardship may be requested.

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

Cost effectiveness

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

Increased revenue; Decreased expenditures

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

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

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

Currently assisted households 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.

Non-elderly, non-disabled families

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

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

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

This activity will apply to non-elderly, non-disabled under both the tenant-based and project-based voucher programs. All special purpose vouchers, including VASH, EHV, Shelter Plus Care and Mainstream vouchers will be excluded.

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.

CKHA has worked closely with staff from HUD and its research partner, MDRC, to develop the policies procedures and forms to implement the tiered rent study and to train staff. Study enrollment began in March 2023 for households with annual reexamination dates starting in July 2023 and new admissions began July 2023 for one year.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Provided Already

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

Dependent allowance; Unreimbursed childcare costs

1.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

Simplifying reporting and verification of income by excluding incomes that are challenging to verify or calculate but have little impact on households in terms of what they can afford. Full or part-time students, of any age, will have school grants and funding of ALL kinds excluded. Only earned income will be included. Elderly and disabled households will be exempt from this policy per the Safe Harbor.

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

Cost effectiveness; Self-sufficiency

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

Neutral (no cost implications)

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

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

Not yet implemented.

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?

For full or part-time students, school grants and funding of ALL kinds will be excluded.

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

Simplifying reporting and verification of income by excluding incomes that are challenging to verify or calculate but have little impact on households in terms of what they can afford. Full or part-time students, of any age, will have school grants and funding of ALL kinds excluded. Only earned income will be included. Elderly and disabled households will be exempt from this policy per the Safe Harbor.

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

Cost effectiveness; Self-sufficiency

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

Neutral (no cost implications)

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

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

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

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

This activity will apply to non-elderly, non-disabled under both the tenant-based and project-based voucher programs. All special purpose vouchers, including VASH, EHV, Shelter Plus Care and Mainstream vouchers will be excluded.

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.

not yet implemented

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?

For full or part-time students, school grants and funding of ALL kinds will be excluded.

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

CKHA will increase the payment standard up to 120% of the Fair Market Rent. Due to the rental market increase, this payment standard increase will keep pace with that market increase and make it easier for voucher holders to find a place

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| of their choice. This is not expected to increase the monthly amount that the tenant will pay as it is more likely that the particular unit would fall within the payment standard. |
| 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 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. CKHA has seen an increase in affordability, which benefits tenants while increasing access to housing and housing choice. The downside is the additional cost to CKHA in a rapidly expanding rent market. |
| Does this MTW activity require a hardship policy? Provided Already |
| Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No |
| Does the MTW activity require an impact analysis? Provided Already |
| Please explain the payment standards by FMR: CKHA will increase the payment standards up to 120% of the FMR. |

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| 2.d. - Rent Reasonableness – Third-Party Requirement (HCV) |
| Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented. CKHA uses a process that includes obtaining reasonable rent determinations from a third-party company and their national database. This ensures fair and valid determinations and increases cost effectiveness while decreasing staff administrative burden. |
| 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? |

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| The MTW activity applies to all assisted households |
| <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>Resulted in a significant decrease for expenditures related to paying for third-party services.</p> |
| <p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p> |
| <p>Please explain or upload a description of the quality assurance method.</p> <p>CKHA's reasonable process includes using rent comparables generated by an energy consumption consultant to identify comparable units. The rent reasonableness determinations will be performed by a CKHA staff person who is trained on HCV and PBV rent reasonableness regulations, usually the Director of Voucher Management, the Chief Operations Officer will verify that processes have been followed and then a staff person from the Finance department, who is trained on HCV and PBV rent reasonableness regulations, will review to ensure independence, impartiality and integrity.</p> <p>No document is attached.</p> |
| <p>Please explain or upload a description of the rent reasonableness determination method.</p> <p>CKHA uses a third-party energy consumption consultant to generate rent comparables for the HCV and PBV programs. The reasonable rent system uses only unassisted units for comparables and considers, in each determination, location, quality, size, unit type, age, amenities, housing services, maintenance and utilities to be provided by the owner. Once the software generates comparables, a CKHA staff member who is knowledgeable about HCV and PVB rent reasonableness regulations reviews the comparables to confirm that they are comparable to the specific unit.</p> <p>No document is attached.</p> |

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| 3.a. - Alternative Reexamination Schedule for Households (PH) |
| <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>An additional waiver for triennial recertifications, separate from the Rent Reform Demonstration has been approved. This request for a second waiver allows for triennial reexaminations for households where the head, co-head, and/or spouse is elderly or disabled. This decreases administrative burden and burden on the older/disabled tenants. In the case of PH households, no adjustments are made to the tenant file unless there is a change in household composition, or a hardship is requested.</p> <p>See the FY22 MTW Supplement for a full description of this activity related to households assigned to tiered rent. This activity has been approved by HUD and is currently being implemented.</p> <p>CKHA received approval to implement triennial reexaminations for families who are part of the Tiered Rent Demonstration and selected to pay under the tiered rent policy.</p> |
| <p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness; Self-sufficiency</p> |
| <p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Decreased revenue; Decreased expenditures</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> |

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| The MTW activity applies only to a subset or subsets of assisted households |
| Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? New admissions and currently assisted households |
| Does the MTW activity apply to all family types or only to selected family types? The MTW activity applies only to selected family types |
| Please select the family types subject to this MTW activity. Other – another specifically defined target population or populations. |
| If Other Selected in Previous Question: Please describe this target population in the text box. 1. Related to Tiered Rent Households - applies to non-elderly/non-disabled family types. 2. Triennial waiver related to Elderly/disabled households – MTW activity applies to all developments and is based on the age and disability status of the residents in the individual unit. |
| Does the MTW activity apply to all public housing developments? The MTW activity applies to all developments |
| Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. CKHA has worked closely with staff from HUD and its research partner, MDRC, to develop the policies procedures and forms to implement the tiered rent study and to train staff. Study enrollment began in March 2023 for households with annual reexamination dates starting in July 2023 and new admissions beginning July 2023. Enrollment ended after one calendar year. The triennial waiver related to elderly/disabled households has not yet been implemented. |
| Does this MTW activity require a hardship policy? Provided Already |
| Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? 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 waiver is for Tiered Rent triennials and allows CKHA to implement the tiered rent policy as designed by HUD. |
| Does the MTW activity require an impact analysis? Provided Already |
| |

What is the recertification schedule?

Once every three years

How many interim recertifications per year may a household request?

2 or more

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

For Tiered Rent Households, rather than having one possible interim, there will be a hardship policy in effect so that the family may request a hardship for six months when a qualifying circumstance happens (two months for an extenuating circumstance). There is no limit to the number of hardships a family may request. A hardship policy applicable to the current request (elderly/disabled households) is separate. The hardship policy affecting households that are ineligible for the Rent Reform Demonstration allows for a hardship request for a decrease in income by 10% or more or another extenuating circumstance. For a hardship due to a decrease in income, elderly/disabled households will maintain the hardship amount of TTP/Rent for six months. For an extenuating circumstance, the TTP/Rent will be set at \$50 for two months before returning to the pre-hardship amount.

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**

An additional waiver for triennial recertifications, separate from the Rent Reform Demonstration has been approved. This request for a second waiver allows for triennial reexaminations for households where the head, co-head, and/or spouse is elderly or disabled. This decreases administrative burden and burden on the older/disabled tenants. In the case of PH households, no adjustments are made to the tenant file unless there is a change in household composition, or a hardship is requested. For HCV households, there is an update completed annually between triennial recertifications that takes COLA into account.

See the FY22 MTW Supplement for a full description of this activity related to households assigned to tiered rent. This activity has been approved by HUD and is currently being implemented.

CKHA received approval to implement triennial reexaminations for families who are part of the Tiered Rent Demonstration and selected to pay under the tiered rent policy.

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

Cost effectiveness; Self-sufficiency

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

Decreased revenue; Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

| |
|---|
| Other – another specifically defined target population or populations. |
| <p>If Other Selected in Previous Question: Please describe this target population in the text box.</p> <p>1. Related to Tiered Rent Households - applies to non-elderly/non-disabled family types. 2. Triennial waiver related to Elderly/disabled households – MTW activity applies to all based on the age and disability status of the residents in the individual unit.</p> |
| <p>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p> <p>The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers</p> |
| <p>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</p> <p>For HCV, this waiver applies to all elderly/disabled households under both the tenant-based and project-based voucher programs. This activity will apply to non-elderly, non-disabled under both the tenant-based and project-based voucher programs that have been selected for Tiered Rent. All special purpose vouchers, including VASH, EHV, COC and Mainstream vouchers are excluded.</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>CKHA has worked closely with staff from HUD and its research partner, MDRC, to develop the policies procedures and forms to implement the tiered rent study and to train staff. Study enrollment began in March 2023 for households with annual reexamination dates starting in July 2023 and new admissions beginning July 2023. Enrollment ended after one calendar year. The triennial waiver related to elderly/disabled households has been implemented for effective dates starting January 2025. It is too soon to determine the impact.</p> |
| <p>Does this MTW activity require a hardship policy?</p> <p>Provided Already</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 waiver is for Tiered Rent triennials and allows CKHA to implement the tiered rent policy as designed by HUD.</p> |
| <p>Does the MTW activity require an impact analysis?</p> <p>Provided Already</p> |
| <p>What is the recertification schedule?</p> <p>Once every three years</p> |
| <p>How many interim recertifications per year may a household request?</p> |

2 or more

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

For Tiered Rent Households, rather than having one possible interim, there will be a hardship policy in effect so that the family may request a hardship for six months when a qualifying circumstance happens (two months for an extenuating circumstance). There is no limit to the number of hardships a family may request. A hardship policy applicable to the current request (elderly/disabled households) is separate. The hardship policy affecting households that are ineligible for the Rent Reform Demonstration allows for a hardship request for a decrease in income by 10% or more or another extenuating circumstance. For a hardship due to a decrease in income, elderly/disabled households will maintain the hardship amount of TTP/Rent for six months. For an extenuating circumstance, the TTP/Rent will be set at \$50 for two months before returning to the pre-hardship amount.

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

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

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented. CKHA will allow for self-certification of assets up to \$50,000, which will ease administrative burden and burden put upon tenants to provide lengthy, often difficult to obtain, verification documentation.

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

Cost effectiveness; Self-sufficiency

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

Decreased expenditures

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

The MTW activity applies 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.

CKHA received HUD approval for this waiver and has begun implementing it. This waiver has reduced staff burden by saving a significant amount of time not following up with third parties for verification or waiting on tenants to provide the documentation.

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

No

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

\$50,000.

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

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

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

| |
|---|
| CKHA will allow for self-certification of assets up to \$50,000, which will ease administrative burden and burden put upon tenants to provide lengthy, often difficult to obtain, verification documentation. |
| Which of the MTW statutory objectives does this MTW activity serve? Cost effectiveness; Self-sufficiency |
| What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Decreased expenditures |
| Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies 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. CKHA received HUD approval for this waiver and has begun implementing it. This waiver has reduced staff burden by saving a significant amount of time not following up with third parties for verification or waiting on tenants to provide the documentation. |
| Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No |
| Please state the dollar threshold for the self-certification of assets. \$50,000. |

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| 5.c. - Third-Party Requirement (HCV) |
| Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented. CKHA performs HQS/INSPIRE Inspections on PBV units that it owns, manages/controls. |
| 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 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? |

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| The MTW activity applies to all family types |
| Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers |
| Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity. PBV units that CKHA owns, manages or controls. |
| Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. CKHA received HUD approval for this waiver and has begun implementing it. This waiver has saved a significant amount of time and money by not paying outside sources and waiting on an opening in their schedule. This also allows for families to be housed more quickly. |
| 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 CKHA will continue to meet the requirements under 24 CFR 982.401 and NSPIRE-V. Any staff member conducting inspections will be trained on the HQS/NSPIRE-V standards. Participants will continue to be allowed to request a special inspection. The CKHA staff member chosen, generally the Director of Voucher Management, will randomly select a sample of 5% of the inspections completed in the last 30 days to complete quality control selection. CKHA will obtain the services of a third-party entity to determine if PHA-owned units pass HQS/INSPIRE-V, upon the request of HUD. No document is attached. |

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| 9.b. - Increase PBV Project Cap (HCV) |
| Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented. Increasing PBV project caps provides for more flexible use of housing units and increased choice for tenants. |
| Which of the MTW statutory objectives does this MTW activity serve? Cost effectiveness; Housing choice |
| What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Increased revenue |
| Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies to all assisted households |
| Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. CKHA received HUD approval for this waiver and has begun implementing it. This waiver allows expansion of affordable |

housing to a wider audience.

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

No

9.g. - Increase PBV Rent to Owner (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

CKHA is authorized to develop a local process to determine the initial and re-determined rent to owner. The agency may increase rents up to the lesser of 120% of Fair Market Rents or rent reasonableness. CKHA implements this activity within the Safe Harbor limits established by the MTW Operations Notice. CKHA increased PBV rent to the owner to make it more attractive for landlords to participate in the program. This increases the availability of housing choices and makes it more likely that existing and new landlords will want to participate.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

CKHA received HUD approval for this waiver and has begun implementing it. This waiver allows for increased housing choices. Currently, the increase hasn't reached 120% at all properties due to the increased expenditure amount. CKHA is implementing rent at 110% in Clay and Kanawha Counties, 115% in Putnam County and 120% for all PBV units.

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 agency is authorized to waive the requirement to provide a tenant-based voucher at 12 months: rather a tenant-based voucher will be granted (depending upon availability) at 24 months, with the exception for approved requests for reasonable accommodation according to existing rules. This limitation will not apply to portability moves that are justified under laws and regulations applicable to the federal Violence Against Women Act and/or those that support a reasonable accommodation. Currently assisted households will not be impacted.

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 only to a subset or subsets of assisted households |
| Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? New admissions (i.e., applicants) only |
| Does the MTW activity apply to all family types or only to selected family types? The MTW activity applies to all family types |
| Does the MTW activity apply to all 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. not yet began implementation |
| Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No |

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| 10.b.PH - Alternative Structure for Establishing Program Coordinating Committee (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 CKHA established the Program Coordinating Committee (PCC) in coordination with the American Job Center (AJC)/One-Stop, which houses several provider agencies in one building and allows for stronger and more frequent communication as a whole or with individual partnerships. This alternative PCC provides support for the FSS program. |
| 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 only to a subset or subsets of assisted households |
| Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? New admissions and currently assisted households |
| Does the MTW activity apply to all family types or only to selected family types? The MTW activity applies to all family types |

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

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

CKHA received HUD approval for this waiver and has begun implementing it. This waiver has saved a significant amount of time by not requiring coordination between multiple agencies to attend multiple meetings. Having PCC meetings in conjunction with existing meetings at the American Job Center, in addition to holding office space there, provides immediate access to the most referred agencies.

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 describe the alternative structure and how it is designed to secure local resources to support an MTW Self-Sufficiency program.

The Family Self-Sufficiency Coordinators are partners in the local American Job Center (AJC)/One-Stop, in which one building holds representatives from several provider agencies across the county and region. Partners hold meetings monthly and when any partner needs specific resources. CKHA maintains office space and conducts appointments in this building as well.

10.b.HCV - Alternative Structure for Establishing Program Coordinating Committee (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

CKHA established the Program Coordinating Committee (PCC) in coordination with the American Job Center (AJC)/One-Stop, which houses several provider agencies in one building and allows for stronger and more frequent communication as a whole or with individual partnerships. This alternative PCC provides support for the FSS program.

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 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?

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| New admissions and currently assisted households |
| Does the MTW activity apply to all family types or only to selected family types? The MTW activity applies to all family types |
| Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? The MTW activity applies to all properties with project-based vouchers |
| Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. CKHA received HUD approval for this waiver and has begun implementing it. This waiver has saved a significant amount of time by not requiring coordination between multiple agencies to attend multiple meetings. Having PCC meetings in conjunction with existing meetings at the American Job Center, in addition to holding office space there, provides immediate access to the most referred agencies. |
| 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 describe the alternative structure and how it is designed to secure local resources to support an MTW Self-Sufficiency program. The Family Self-Sufficiency Coordinators are partners in the local American Job Center (AJC)/One-Stop, in which one building holds representatives from several provider agencies across the county and region. Partners hold meetings monthly and when any partner needs specific resources. CKHA maintains office space and conducts appointments in this building as well. |

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| 10.d.PH - Modify or Eliminate the Contract of Participation (PH) |
| Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative Waiver #1 - See the FY25 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented. The Family Self-Sufficiency (FSS) Contract of Participation (CoP) will be modified for new FSS program enrollees to a 5-year period, beginning the first day of the month following the family's enrollment appointment New Waiver - #2 For any new enrollments, the FSS program start date will be the actual date of the enrollment meeting and completion of the Contract of Participation with enrollment signatures rather than on the first of the following month. New Waiver - #3 If the Contract of Participation (CoP) is ended for any reason other than the participants failure or refusal, without good cause, to comply with the CoP, the contract will be considered nullified rather than terminated, and the FSS escrow funds earned up to that date will be distributed to the family. |
| Which of the MTW statutory objectives does this MTW activity serve? |

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| Cost effectiveness; Self-sufficiency |
| What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. 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. Changing the structure of the PCC has increased efficiency and greatly decreased the time it takes to link an individual to a provider. Waivers 2 and 3 are not yet implemented. |
| 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. |

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| 10.d.HCV - Modify or Eliminate the Contract of Participation (HCV) |
| Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative Waiver #1 - See the FY25 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented. The Family Self-Sufficiency (FSS) Contract of Participation (CoP) will be modified for new FSS program enrollees to a 5-year period, beginning the first day of the month following the family's enrollment appointment New Waiver - #2 For any new enrollments, the FSS program start date will be the actual date of the enrollment meeting and completion of the Contract of Participation with enrollment signatures rather than on the first of the following month. New Waiver - #3 If the Contract of Participation (CoP) is ended for any reason other than the participants failure or refusal, without good cause, to comply with the CoP, the contract will be considered nullified rather than terminated, and the FSS escrow funds earned up to that date will be distributed to the family. |
| Which of the MTW statutory objectives does this MTW activity serve? Cost effectiveness; Self-sufficiency |
| What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. |

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.

Changing the structure of the PCC has increased efficiency and greatly decreased the time it takes to link an individual to a provider.

Waivers 2 and 3 are not yet implemented.

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.

| | |
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| 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? Yes</p> | | | | | | | |
| | <table border="1"> <thead> <tr> <th>Title</th> <th>Supporting Documents Attached</th> </tr> </thead> <tbody> <tr> <td>MTW Agency-Specific Waiver #1- REVISED: Modification to the Income Verification Hierarchy when there is no access to EIV</td> <td>0</td> </tr> <tr> <td>MTW Agency-Specific Waiver #2: Extension of HAP Contract Execution Period (2026)</td> <td>0</td> </tr> </tbody> </table> | | Title | Supporting Documents Attached | MTW Agency-Specific Waiver #1- REVISED: Modification to the Income Verification Hierarchy when there is no access to EIV | 0 | MTW Agency-Specific Waiver #2: Extension of HAP Contract Execution Period (2026) | 0 |
| | Title | Supporting Documents Attached | | | | | | |
| MTW Agency-Specific Waiver #1- REVISED: Modification to the Income Verification Hierarchy when there is no access to EIV | 0 | | | | | | | |
| MTW Agency-Specific Waiver #2: Extension of HAP Contract Execution Period (2026) | 0 | | | | | | | |
| | | | | | | | | |

| E.2 | Agency-Specific Waiver(s) for which HUD Approval has been Received: Does the MTW agency have any approved Agency-Specific Waivers? Yes | | | | |
|-----|--|--|---|---|---|
| | Title | Has there been a change in how the waiver is being implemented from when it was originally approved? | Please provide a description of what has changed. | Please provide a description of the final outcomes and lessons learned from implementing this Activity at your PHA. | If the MTW Agency was previously required to prepare an impact analysis, was a final impact analysis prepared at the time of discontinuation? |
| | #1 Modification to the Income Verification Hierarchy for Tiered Rent Households. | Yes | No change has been implemented yet. One agency-specific waiver being requested this year is a revision to this waiver that includes tenant-provided documents when there is no access to EIV. | | |

| 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 |
|---------------------------|---|---|-----------------------------|------------|
| 2022 | \$5,038,721 | \$5,038,721 | \$0 | 2030-09-30 |
| 2023 | \$5,756,126 | \$5,756,126 | \$0 | 2031-09-30 |
| 2024 | \$5,567,579 | \$5,567,579 | \$0 | 2032-09-30 |
| 2025 | \$5,008,189 | \$4,553,649 | \$454,540 | 2033-09-30 |
| 2026 | | \$0 | | 2034-09-30 |

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|---|--|
| G. | MTW Statutory Requirements. |
| G.1 | <p>75% Very Low Income – Local, Non-Traditional.</p> <p>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.</p> |
| 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. |
| <p>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?</p> <p>Yes</p> | |

| | |
|---|---|
| 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. |
| <p>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.</p> | |

| 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. | |
| No additional public hearing was held for an Agency-Specific Waiver and/or Safe Harbor waiver | |

| I. | Evaluations. |
|--|--------------|
| Yes - This table lists evaluations of Charleston/Kanawha Housing Authority's MTW activities, including the names of evaluators and available reports | |

Table I.1 - Evaluations of MTW Policies

| Title and short description | Evaluator name and contact information | Time period | Reports available |
|---------------------------------------|--|-------------|---|
| Stepped and Tiered Rent Demonstration | MDRC | 2023-2030 | https://www.huduser.gov/portal/mtw/cohort2.html |