

PHA Name : Housing Authority Of The County Of Santa Cruz

PHA Code : CA072

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2024

PHA Program Type: Combined

MTW Cohort Number: Asset Building

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The Housing Authority of the County of Santa Cruz (HACSC) is pleased to submit this Fiscal Year (FY) 2024 Moving to Work (MTW) Supplement component of the Annual PHA Plan. HUD designated HACSC as an MTW Agency in September 2022, through the MTW Asset Building Cohort, to test asset building initiatives to encourage growth of savings accounts and/or aim to build credit for assisted households. HACSC's MTW Plan and Application selected the HUD defined "Opt-Out Savings Account" as the initial MTW asset building activity. HACSC has worked this past year with HUD and the evaluation team to develop and implement the "Opt-Out Savings Account" initiative. HACSC has also actively participated in the "Community of Practice" with HUD, the evaluation team, and other MTW agencies in the Asset Building Cohort to further develop and implement best practices related to asset building.

This supplement identifies the MTW waivers and activities that HACSC has implemented and hopes to implement to achieve the three MTW statutory objectives which are outlined in more detail below in the sections of Economic Mobility, Cost Effectiveness, and Housing Choice.

Economic Mobility: Implementation of the Opt-Out Savings Account initiative is the focal point of HACSC initial economic mobility efforts. HACSC plans to use the Opt-Out Savings Account program as the baseline for future economic mobility programs. This initiative will assist HACSC to build and expand upon a network of partnerships with service providers, financial service institutions, and other community-based organizations to promote economic mobility. In the first year, the HACSC partnered with a financial capabilities service organization which will provide individual financial coaching sessions to Opt-Out Savings Program participants. Other activities to support economic mobility include administrative changes to the Housing Choice Voucher program such as alternative income inclusions / exclusions, alternative reexamination schedule, and extension of zero HAP participation from 180 to 360 days. HACSC anticipates these initiatives will reduce or eliminate regressive aspects of the program and will encourage assisted households to seek employment opportunities, increased wages, and build assets.

Cost Effectiveness: HACSC is leveraging MTW authority and has implemented a range of waivers to achieve administrative efficiencies and cost effectiveness. These waivers are enabling HACSC to provide more meaningful service to enhance customer service, and to reduce administrative burden for participants and property owners. Program participants benefit from alternative income inclusions / exclusions, alternative reexamination schedule, and self-certification of assets. HACSC conducting certain HQS functions and PBV processes in which third-party assistance was previously required has eliminated administrative time spent coordinating contractors, and support tenants to secure housing. Administrative time savings have allowed HACSC to provide additional resources to our families through the addition of a new Resident Services Coordinator.

Housing Choice: HACSC's approach to improving housing choice includes providing housing stability to program participants that are already housed through waivers such as alternative income inclusions/exclusions, alternative reexamination schedule, and Moving On policies to align tenant rent and utility payments between partner agencies. The strategy to promote housing choice and to increase the supply of affordable housing is being achieved through our increase to the PBV program cap and PBV project cap. The ability to expand the PBV program is already providing new housing opportunities to program participants and supporting the development of hundreds of new affordable housing units within our community. Additionally, housing choice will be expanded through implementation of an Agency Specific Waiver to adopt an alternative reasonable cost formula to include Hard Construction Cost (HCD) and Total Development Cost (TDC) for development and construction activities under the local non-traditional activities, and through a Safe Harbor Waiver to 17.c. Total Development Cost.

HACSC is excited to be participating in the Asset Building Cohort and implementing MTW waivers that achieve HUD's statutory objectives. These activities align with the HACSC mission and our long-term vision for MTW.

Under the MTW Operations Notice, the Housing Authority of the County of Santa Cruz is authorized to flexibly and interchangeably utilize Public Housing Operating Fund, Capital Fund Program and certain Housing Assistance Payments funds for any purpose authorized under Sections 8 and 9 of the US Housing Act of 1937 and for local, non-traditional activities. The agency may utilize this flexibility over the fiscal year to support activities described in the Annual Plan in accordance with the requirements of the Operations Notice. HACSC intends, per Federal Register Notice FR-6284-N-01, to extend the term of FUP-Youth and FYI voucher assistance for up to an additional 24 months for youth participating in the HACSC Family Self-Sufficiency (FSS) program or who otherwise meet the criteria for extension as stipulated in FR-6284-N-01.

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

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

C. MTW Activities Plan that Housing Authority Of The County Of Santa Cruz Plans to Implement in the Submission Year or Is Currently Implementing

1.u. - Standard Deductions (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 HACSC intends to establish a standard deduction for medical expenses applicable to all elderly and disabled households with medical expenses exceeding an established threshold. The standard deduction for medical expenses and the threshold at which it applies shall both be indicated in the HACSC Section 8 Administrative Plan. Eligible elderly and disabled families who claim medical expenses at or above the established threshold will be required to sign a self-certification.

This MTW activity doesn't impact the family's eligibility to receive the elderly/disabled and dependent deductions in accordance with §5.611(a)(1) – (a)(2).

For purposes of this MTW activity, medical expenses are defined in accordance with 24 CFR §5.603: Health and medical care expenses are any costs incurred in the diagnosis, cure, mitigation, treatment, or prevention of disease or payments for treatments affecting any structure or function of the body. Health and medical care expenses include medical insurance premiums and long-term care premiums that are paid or anticipated during the period for which annual income is computed.

For FY starting 7/1/2024, the proposed standard deduction for medical expenses is \$1,500 for elderly and disabled households with expenses at or above a \$1,500 threshold. HACSC will periodically adjust the amount of the standard medical deduction, adhering to HUD's methodology for calculating inflationary adjustments for the elderly/disabled family deduction, pursuant to a pending HUD Federal Register notice.

The MTW activity applies to all tenant-based units and properties with project-based vouchers.

Households may request a Medical Expense Hardship exemption to the standard deduction in accordance with the HACSC Medical Expense Hardship Policy. Families requesting a hardship exception will be asked to complete a medical expense verification packet, and may be asked to provide supporting documents, receipts, and/or contact information of healthcare providers that can verify the expenses.

Staff currently spend a significant amount of time calculating medical expenses to determine a household's allowable medical expense deduction. By establishing a standard deduction for medical expenses, and by allowing households eligible for the standard deduction to self-certify their medical expenses and applying a standardized deduction, significant staff time will be saved. It's anticipated that savings in staff time previously spent calculating medical expenses can be redirected to direct client services or other programs benefiting the clients served by HACSC.

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?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Elderly families; Disabled families (to the extent those families are not exempt via a reasonable accommodation)

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

The MTW activity applies to 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.

The MTW activity applies to all tenant-based units and 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.

N/A

Does this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

No

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

No

How many hardship requests have been received associated with this activity in the past year?

No hardship were requested in the most recent fiscal year.

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

Does the impact analysis apply to more than this MTW activity?

No

How much will the single standard deduction be in the Fiscal Year?

\$1,500

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

Exclude income from asset-building activities. This change benefits clients, increasing self-sufficiency and housing choice as well as saving tenant time. Additionally, it reduces staff time. Decreased staff paperwork increases operational efficiency and cost-effectiveness.

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

Cost effectiveness; 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.

The asset-building activities are in the process of being implemented, with the first savings deposits anticipated in March, 2024. This waiver will be implemented in tandem with Waiver 5.1.b. Opt-Out Savings Account, which we received formal HUD approval of in December, 2023.

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.

Income attributable to the asset-building activities our PHA has implemented as part of the MTW Asset Building cohort are excluded. Absent this waiver, elderly and disabled households would be excluded, resulting in increased housing costs for these households which would be at cross-purposes with the Asset Building activity.

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

Income attributable to the asset-building activities our PHA implements as part of the MtW Asset Building Cohort is 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

The HACSC has implemented a payment standard between 80% and 120% of Fair Market Rents.

Currently, PHAs are required to establish payment standards between 90% - 120% Fair Market Rents. The waiver provides HACSC with greater flexibility to establish payment standards that reflect market rates, resulting in greater housing choice for program families.

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 Housing Authority has established payment standards ranging between 80% and 120% of the Fair Market Rent (FMR). This strategic utilization of payment standards offers flexibility within a reasonable range, aiming to accommodate varying housing market conditions for the benefit of program participants.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

No

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

No

How many hardship requests have been received associated with this activity in the past year?

No hardship were requested in the most recent fiscal year.

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

No

Does the MTW activity require an impact analysis?

No

No document is attached.

Please explain the payment standards by FMR:

Currently, PHAs are required to establish payment standards between 90% - 120% Fair Market Rents. This approved waiver provides HACSC with greater flexibility to establish payment standards that reflect market rates, resulting in greater housing choice for program families.

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

HACSC will no longer require a third party to conduct rent reasonableness tests at PBV properties that HACSC owns, manages, and/or controls. HACSC will follow the rent reasonableness process used for all other HCV properties and conduct the test using a database consisting of comparable units or properties. Requiring approval from a third party increases costs and creates potential delays in the availability of needed housing units. Conducting these rent reasonableness tests in-house will achieve greater cost-effectiveness in federal expenditures, improve administrative efficiencies, eliminate confusion for staff and participants, and improve the response time for conducting rent reasonableness analyses. The agency will meet all safe harbor requirements of the Operations Notice including (1) The agency shall establish and make available a quality assurance method to ensure impartiality; (2) The agency shall make available the method used to determine that rents charged by owners to voucher participants are reasonable when compared to similar unassisted units in the market area; and (3) At the Department's request, the agency must obtain the services of a third-party.

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

Cost effectiveness; Housing choice

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

Decreased expenditures

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

The MTW activity applies 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 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.

Applies only to PBV units owned or controlled by the PHA.

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 Housing Authority has implemented the waiver, and no longer uses a third party to conduct rent reasonable tests for PBVs at properties owned and/or controlled by the Agency.

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

No

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

The HACSC has developed and implemented procedures for the conduct of regularly scheduled quality control of PHA-owned rent reasonableness assessments, including establishing the sampling size and frequency within the procedures and designating quality control roles and responsibilities.

This explanation is provided in lieu of an uploaded document.

No document is attached.

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

Reasonable rent is currently determined using information produced by AffordableHousing.com, a national rent reasonableness system, via the AffordableHousing.Com database. The AffordableHousing.com database meets HUD regulatory requirements for rent comparisons based on comparable unassisted units, including information about each unit's location, size, type, age, quality/condition, utilities and amenities. HACSC may institute a change to which database is used for Rent Reasonableness determinations but will always utilize a national rent reasonableness system that meets HUD regulatory requirements.

This explanation is provided in lieu of an uploaded document.

No document is attached.

3.b. - Alternative Reexamination Schedule for Households (HCV)

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

Reducing the frequency of household certifications allows participants to keep more of their income as their income increases. It also reduces the burden on both participants and Housing Specialists in acquiring, submitting, and processing paperwork. This waiver gives tenants a longer time with stable rent to allow for better financial planning and housing security. Tenants have a greater ability to save for and accomplish life goals such as pursuing education and rent independence or home ownership. To enhance self-sufficiency and increase housing choice, HACSC will not perform an interim reexamination for earned and/or unearned income increases that occur between regularly scheduled reexaminations, regardless of the amount of the increase, unless requested by the family.

There is no limit to the number of interim reexaminations a family may request per year, without requesting a hardship, for qualifying events.

The activity meets all of the applicable safe harbor requirements in the Operations Notice including (1) Reexaminations must occur at least every three years; (2) The agency must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more; (3) Agency must implement an impact analysis; and (4) Agency must include a hardship 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.

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.

HACSC has implemented the waiver with no changes to the waiver request as submitted. With HACSC's waiver of certain provisions of 24 CFR Part 982.516(a) and (c), HACSC has introduced an Alternative Reexamination Schedule to streamline reevaluation processes. Under this initiative, MTW households reliant on fixed-income sources undergo reexaminations at least every three years, non-fixed income MTW households every two years, and all other households annually. Fixed income is defined as stable and primary income sources such as Social Security, Disability Insurance,

employment pensions, Veterans Affairs benefits, or similar. As this waiver was written and implemented, HACSC conducts interim adjustments to redetermine subsidy only when the household experiences a qualifying event. Qualifying events are described in the HCV Administrative Plan and include decreases in income, increases in income when requested by the household, changes in household composition, and changes to the contract rent.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

No

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

No

How many hardship requests have been received associated with this activity in the past year?

No hardship were requested in the most recent fiscal year.

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

Does the impact analysis apply to more than this MTW activity?

No

What is the recertification schedule?

Other

The Housing Authority will conduct reexaminations for fixed-income households at least every three years, conduct reexaminations for non-fixed income households under MTW flexibility at least every two years, and all other households will have a reexamination conducted annually. Fixed Income means primary or sole source of income that comes from stable and fixed sources such as Social Security, Social Security Disability Insurance, employment pensions, Veterans Affairs benefits, or similar. Zero income families are not considered to be fixed income; zero income families will have reexaminations conducted annually.

In between reexaminations, the HACSC will conduct any number of interim adjustments to redetermine subsidy when the household experiences a qualifying event. Qualifying events will include decreases in income, without regard to a specified threshold, increases in income (when requested by the household), changes in household composition, and changes to the contract rent. When interim adjustments are conducted, HACSC may apply payment standards and utility allowances in effect at the time of the effective date of the adjustment. HACSC will reserve the right to conduct reexaminations more frequently either for administrative or financial reasons. HACSC will not perform an interim reexamination for both earned and unearned income increases that occur between regularly scheduled reexaminations, regardless of the amount of the increase, unless requested by the family.

Families may also request an interim reexamination under the HACSC hardship policy. A hardship may be requested if a family has experienced a decrease in income because of changed circumstances, including loss or reduction of

employment, death in the family, or reduction in or loss of earnings or other assistance; and/or, the family has experienced an increase in expenses, because of changed circumstances, for medical costs, childcare, transportation, education, or similar items.

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.

The HACSC will conduct reexaminations for fixed-income families at least every three years and will conduct reexaminations for all remaining (non-fixed-income families) at least every two years. Between reexaminations, the HACSC will conduct interim adjustments to redetermine subsidy when the household experiences a qualifying event. Qualifying events are described in the HCV Administrative Plan and include decreases in income, increases in income (when requested by the household) changes in household composition, and changes to the contract rent. When interim adjustments are conducted, HACSC may apply payment standards and utility allowances in effect at the time of the effective date of the adjustment. HACSC will reserve the right to conduct reexaminations more frequently either for administrative or for financial reasons.

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

At reexamination, the agency will allow the self-certification of assets up to \$50,000. Reduced documentation requirements will reduce staff time for processing, thereby increasing operational efficiency and cost effectiveness. Reducing documentation saves time for staff and the majority of tenants whose assets are below a level that makes a difference in qualifying for support.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

The Housing Authority has implemented this waiver and is allowing households to self-certify assets up to \$50,000. This initiative simplifies the asset verification process, empowering eligible households to self-report assets within the specified threshold.

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.

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

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.

HACSC eliminated the requirement for third -party inspections at PBV properties the PHA owns, manages, and/or controls, which will save staff time, increase operational efficiency, and increase cost effectiveness. Additionally, it may increase housing choice for tenants through a faster inspection process. With third-party inspections, delays are beyond HACSC's control. HACSC has certified HQS Inspectors on staff and plans to utilize them for PHA-owned unit inspections. This will increase efficiency and reduce staff time. This change will allow HACSC to operate more efficiently and strategically to serve its mission and focus on innovative programs and services to 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.

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 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.

Applies to properties with project-based vouchers owned and/or controlled by the PHA.

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 Housing Authority has removed the requirement for third-party inspections on PBV units owned by the Agency. This strategic move is streamlining operations, reducing staff workload, and enhancing cost efficiency by eliminating the need for external inspections.

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
HACSC has developed and implemented procedures for the conduct of regularly scheduled quality control of PHA-owned

PBV unit inspections, including establishing the sampling size and frequency within the procedures and designating quality control inspector roles and responsibilities. This explanation is provided in lieu of an upload.

No document is attached.

9.a. - Increase PBV Program Cap (HCV)

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

The HACSC proposes to project-base the lower of fifty percent (50%) of the total authorized units or fifty percent (50%) of annual budget authority of its vouchers to attach the funding to specific affordable units through the Project Based Voucher program.

The Project-Based Voucher (PBV) program allows a Housing Authority to use up to twenty percent (20%) percent of its vouchers to attach the funding to specific affordable units. PHAs may project base an additional ten percent (10%) of vouchers that are excepted from this cap, for units designated for homeless, veterans, supportive services, or in a low poverty census tract.

Benefits to Development: Project basing gives developers a guarantee of a future source of stable income for a development, which can be integral to the financing package that makes constructing or rehabilitating affordable housing possible. In markets facing a housing shortage, this is one of the only tools housing authorities have to spur the construction of new, quality, affordable units. Many families with tenant-based vouchers struggle to find a unit in the private rental market due to an extreme scarcity of rental housing and property owner reluctance to participate in the voucher program. Scarcity of rental units leads to tenant-based vouchers often expiring before a household can secure a unit, and results in loss of voucher assistance. Committing vouchers to affordable properties through the PBV program ensures those units will be available exclusively to voucher households. Since the PBV program promotes construction of affordable housing in high opportunity low poverty neighborhoods, increasing the PBV cap allows more low-income households, often including children, to benefit from good neighborhoods that are likely to have better schools, parks, healthcare, jobs, transportation, and other assets that improve outcomes for low-income families. Families are not required to stay in PBV units and may move into any unit of their choosing in the private market using a tenant-based voucher at the end of their initial lease term, freeing up the PBV unit for the next eligible household waiting for assistance.

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 Housing Authority has implemented this waiver, introduced a new PBV Request for Proposals, and continues to expand the PBV portfolio and spur new affordable housing development.

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

No

What percentage of total authorized HCV units will be authorized for project-basing?

50.00%

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

Allows more than the greater of twenty-five units or 25% of the units at a complex to receive Project-Based Voucher assistance. Under current regulations, "excepted" units that are for the elderly or those providing supportive services are already exempt from this cap. This activity would allow units that may not be serving the excepted populations to go above the cap up to 100% of the units at a project. This will increase housing choice and contribute to the development of additional affordable housing production available to households eligible for the Section 8 Program. The HACSC will continue to be subject to Notice PIH 2013-27 where applicable, or successor notices.

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 Housing Authority has implemented this waiver, introduced a new PBV Request for Proposals, and continues to expand the PBV portfolio and spur new affordable housing development. The Housing Authority has increased the PBV Project Cap, allowing more than the greater of twenty-five units or 40% of the units at a complex to receive PBV assistance. This waiver allows units beyond those designated for the elderly or supportive services to exceed the cap, enabling PBV awards of up to 100% of the units at a project.

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

No

9.c. - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)

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

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. Under this waiver, the HACSC eliminates the independent third-party selection process and competitive process in the award of PBV's to properties owned or controlled by the agency when the agency is not engaged in an initiative to improve, develop, or replace a public housing property or site. All other PBV selection and approval requirements, including HQS compliance, NEPA review and subsidy layering review are still applicable and must be conducted. The HACSC will comply with the following Safe Harbor requirements (1) A subsidy layering review must be conducted; (2) The agency must complete site selection requirements; (4) The agency is subject to Notice PIH 2013-27 where applicable, or successor; and (5) Property must be owned by a single-asset entity of the agency, see Notice PIH 2017-21. The HACSC has an approved MTW waiver to conduct its own inspections for PHA-owned or controlled units.

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?

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.

Applies only to units owned or controlled by the PHA.

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 HACSC eliminated the independent third-party selection process and competitive process in the award of PBV's to properties owned or controlled by the agency when the agency is not engaged in an initiative to improve, develop, or replace a public housing property or site.

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

HACSC will limit moves from PBV units using a Housing Choice Voucher for 24 months after PBV move-in for applicants coming from site-based waiting lists or from non waiting list referral programs. PBV Residents coming from the HCV waiting list will continue to have portability with a Housing Choice Voucher after 12 months. This change ensures that households electing to move into a PBV unit cannot convert to an HCV after only one year, effectively bypassing the HCV waitlist. Additionally, it decreases the administrative burden for staff after initial intake. HACSC will comply with all safe harbor requirements including (1) Portability under this activity must not be restricted for more than 24 months; (2) The agency must have a clear and uniform policy in place to address how move requests are received and how they are approved/denied for PBV households; and (3) Participants must still retain the ability to request a tenant-based voucher for reasonable accommodation according to existing rules.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

The Housing Authority has not yet implemented this waiver. Our Special Purpose Waiver requests for applying MTW flexibilities to VASH, EHV and Stability Vouchers were approved in December 2023, and for VASH and Stability Vouchers this waiver will not be applicable. Now that we have a decision from HUD on the applicability of MTW to VASH, EHV and Stability Vouchers, we will be able to move forward with implementation.

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

No

14.a. - Waive Initial HQS Inspection 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

HACSC may, at their discretion, waive the initial HQS inspection requirement for PSH residents transitioning into voucher-based assistance who are remaining in their unit. Waiving the initial HQS inspection will decrease costs and increase efficiency, allowing the PSH household to transition to voucher-based assistance seamlessly without the disruption of inspection. Participants retain the right to request inspection at any time.

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

Cost effectiveness; Housing choice

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

Decreased expenditures

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

The MTW activity applies 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.

Other – another specifically defined target population or populations.

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

Only residents of Permanent Supportive Housing Programs.

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.

Tenant-based Permanent Supportive Housing units from which resident will transition into a tenant-based or project-based voucher unit.

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 Housing Authority has implemented this waiver and now allows discretion for PSH residents transitioning to voucher-based assistance and staying in their current unit to potentially bypass the Initial HQS inspection. This streamlined approach aims to enhance efficiency and minimize costs during transitions, while participants retain the option to request an inspection at their convenience.

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

No

14.b.HCV - Allow Income Calculations from Partner Agencies (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

HACSC may, at their discretion, utilize the income calculations and documentation from partner agencies for PSH households transitioning to voucher based assistance, provided that income calculations must be determined in accordance with 24 CFR 5.609 and that any income calculations accepted from partner agencies must have been calculated within the past year. Utilizing the income calculations and documentation from partner agencies will decrease costs and increase efficiency, allowing the PSH household to transition to voucher-based assistance quickly and seamlessly without completing redundant paperwork and procuring verification documents, which can be extremely challenging for vulnerable populations.

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?

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.

Other – another specifically defined target population or populations.

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

Only residents of Permanent Supportive Housing Programs transitioning to a voucher.

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.

Tenant-based Permanent Supportive Housing units from which resident will transition into a tenant-based or project-based voucher unit.

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 Housing Authority has implemented a waiver allowing the use of partner agency income calculations and documentation, aligning with 24 CFR 5.609 (defining annual income) and within a one-year timeframe. This measure is aimed at streamlining transitions, reducing costs, and simplifying the process for PSH households by eliminating redundant paperwork and easing document verification burdens, especially for vulnerable populations.

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

No

14.c.HCV - Aligning Tenant Rents and Utility Payments Between Partner Agencies (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

HACSC may, at their discretion, adjust the subsidy for PSH residents transitioning into voucher-based assistance to align the tenant's portion of rent with the PSH program they are transitioning from. If a PSH tenant is transitioning from a program with a different subsidy structure, the transition could result in a significant increase in the tenant's contribution of rent, potentially resulting in displacement from their current unit. Having the flexibility to align the voucher subsidy with the subsidy from the PSH program will avoid increases in tenant rent burden and the potential for displacement.

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 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.

Other – another specifically defined target population or populations.

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

Only residents of Permanent Supportive Housing Programs transitioning to a voucher.

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.

Tenant-based Permanent Supportive Housing units from which resident will transition into a tenant-based or project-based voucher unit.

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 Housing Authority has implemented a waiver enabling the adjustment of subsidies for PSH residents transitioning to voucher-based assistance, aligning with the tenant's previous rent contributions from their PSH program. This measure aims to prevent substantial increases in tenant rent payments during transitions between programs with varying subsidy structures, thereby mitigating the risk of displacement for affected individuals.

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

No

17.c. - Housing Development Programs

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

HACSC intends to use MTW funding to acquire, renovate and/or build affordable units that are not public housing units. Eligible activities may include gap financing or construction costs for development of affordable housing, conducted by the PHA or a PHA-controlled affiliate or by a non-PHA affordable housing developer, including but not limited to development of project-based voucher units, tax credit units, or affordable units funded with any other local, state, or federal funds.

HACSC will not spend more than 10% of its HAP budget on local, non-traditional activities. Families receiving housing or services through local, non-traditional activities must meet the definition of low-income. Local, non-traditional development activities will be conducted in accordance with the applicable requirements of PIH Notice 2011-45 and the MTW Operations Notice. The Agency shall comply with Safe Harbor provisions requiring compliance with Section 30 of the 1937 Housing Act and that any MTW Funding awarded to a third-party provider must be competitively awarded.

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.

The waiver has been implemented as designed and funds have been committed to and spent on Housing Development

Programs as indicated in Tables 17.c.1. and 17.c.2. The first project, Natural Bridges Apartments, was completed in December 2024 and is ready for occupancy in January 2025.

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

No

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

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Natural Bridges Apartments, 415 Natural Bridges Drive, Santa Cruz, CA 95060	New construction.	Gap financing.	20.00	20.00	0.00	20.00	0.00	0.00
Chanticleer	Acquisition	To be determined.	50.00	50.00	50.00	0.00	0.00	0.00

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

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Natural Bridges Apartments, 415 Natural Bridges Drive, Santa Cruz, CA 95060	New Construction	Gap Financing	20.00	20.00	0.00	20.00	0.00	0.00
Chanticleer	New Construction	To be determined.	50.00	50.00	50.00	0.00	0.00	0.00

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

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Natural Bridges Apartments, 415 Natural Bridges Drive, Santa Cruz, CA 95060	New Construction	Gap Financing	20.00	20.00	0.00	20.00	0.00	0.00

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

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
	New Construction	Gap Financing	20.00	20.00	0.00	20.00	0.00	0.00

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</p>

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?
		<p>We are currently implementing as approved, however we are requesting HUD authority to implement with the following revisions, to be effective upon HUD's approval, for FY beginning 7/1/2024:</p> <p>For PBV units that also are subject to the requirements of the Low-Income Housing Tax Credit (LIHTC) Program, HACSC proposes to use the TIC form required under the LIHTC Program as verification of the family's income and assets.</p> <p>Owners of PBV units that receive</p>		

E.2

Allow use of
Tenant Income
Certification (TIC)
for PBV eligibility
determination

Yes

LIHTCs must
comply with
Federal LIHTC
regulations, which
are similar to HCV
regulations
regarding
verification of
income and assets
when determining
and recertifying
income eligibility
of residents.

The TIC will only
be used as
verification of
income and
assets.

This MTW activity
applies to:

Both new

			admissions and currently assisted households		
	Extend Zero HAP participation from 180 days to 360 days	No			

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
	\$0	\$0	\$0	
	\$0	\$0	\$0	
	\$0	\$0	\$0	
	\$0	\$0	\$0	
	\$0	\$0	\$0	

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	0
	49%-30% Area Median Income	0
	Below 30% Area Median Income	0
	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.
Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency? Yes	

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.	0 # 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.	0 # 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?
Natural Bridges Apartments 415 Natural Bridges Drive Santa Cruz, CA 95060	0.00	0.00	0.00	0.00	0.00	0.00	0.00	General		0.00	0.00	No	0.00
Totals	0	0	0	0	0	0	0			0	0		

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	0	
2 Person	0	
3 Person	0	
4 Person	0	
5 Person	0	
6+ Person	0	
Totals	0	

H.	Public Comment
<p>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.</p>	
<p>Please see attached for an additional public hearing held for Agency-Specific Waiver(s) and/or Safe Harbor Waiver(s)</p>	

I.	Evaluations.
<p>No known evaluations.</p>	

Housing Authority of the County of Santa Cruz
Hardship Policy
Activity 2.b. – Payment Standards – Fair Market Rents

Under MTW Activity 2.b., the Housing Authority of the County of Santa Cruz (HACSC) will establish payment standards for the Housing Choice Voucher (HCV) program that are between 80% and 120% of the Fair Market Rent (FMR) for each applicable bedroom size. Without this MTW flexibility, payment standards must be established between 90% and 110% of the applicable FMR.

By establishing more flexible payment standards, HACSC projects that overall program participants will benefit and that additional housing opportunities will be affordable to HCV participants including housing units in higher opportunity areas, i.e. areas with lower poverty rates and greater access to jobs, education, services and other amenities. An additional projected benefit is that housing cost burdens may decrease for some households living in units for which the payment standard increases.

The MTW Operations Notice requires that HACSC implement a hardship policy for MTW activity 2.b. HACSC will review this hardship policy during its intake and recertification process. While it is highly unlikely that any household's assistance will be terminated as a result of this activity, if this situation arises, HACSC will consider if a household qualifies for a hardship exemption at the time of potential termination of assistance that is due to this activity.

HUD requires that the hardship policy address the following potential situations:

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

Activity 2.b. will not result in decreases to household income and, therefore, will not create a hardship in this situation. However, households who experience income decreases can request an interim recertification in accordance with HACSC's existing Administrative Plan policies.

The family has experienced an increase in expenses, because of changed circumstances, for medical costs, childcare, transportation, education, or similar items.

If HACSC reduces payment standards below 90% of FMR pursuant to Activity 2.b., some existing HCV participants may experience an increase in total tenant payment (TTP) compared to their TTP prior to implementation of the reduced payment standards. To eliminate any hardship caused by this activity, HACSC will not apply the lower payment standard to families who have already leased units under the higher standard until they move to a new unit. HACSC does not expect any hardship requests as a result of this waiver and no secondary level of review will be required.

**Impact Analysis
MTW Activity 1.u. Standard Deductions (HCV)**

MTW Activity 1.u. Standard Deductions (HCV) – Impact Analysis

Waiver Description: Standard Deduction for Medical Expenses

Describe the MTW activity (including what specifically the agency is proposing to waive), the MTW agency’s goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.

The HACSC intends to establish a standard deduction for medical expenses applicable to all elderly and disabled households with medical expenses exceeding an established threshold. The standard deduction for medical expenses and the threshold at which it applies shall both be indicated in the HACSC Section 8 Administrative Plan. Eligible elderly and disabled families who claim medical expenses at or above the established threshold will be required to sign a self-certification.

This MTW activity doesn’t impact the family’s eligibility to receive the elderly/disabled and dependent deductions in accordance with §5.611(a)(1) – (a)(2).

For purposes of this MTW activity, medical expenses are defined in accordance with 24 CFR §5.603: Health and medical care expenses are any costs incurred in the diagnosis, cure, mitigation, treatment, or prevention of disease or payments for treatments affecting any structure or function of the body. Health and medical care expenses include medical insurance premiums and long-term care premiums that are paid or anticipated during the period for which annual income is computed.

For FY starting 7/1/2024, the proposed standard deduction for medical expenses is \$1,500 for elderly and disabled households with expenses at or above a \$1,500 threshold. HACSC will periodically adjust the amount of the standard medical deduction, adhering to HUD’s methodology for calculating inflationary adjustments for the elderly/disabled family deduction, pursuant to a pending HUD Federal Register notice.

The MTW activity applies to all tenant-based units and properties with project-based vouchers.

Households may request a Medical Expense Hardship exemption to the standard deduction in accordance with the HACSC Medical Expense Hardship Policy. Families requesting a hardship exception will be asked to complete a medical expense verification packet, and may be asked to provide supporting documents, receipts, and/or contact information of healthcare providers that can verify the expenses.

Staff currently spend a significant amount of time calculating medical expenses to determine a household’s allowable medical expense deduction. By establishing a standard deduction for medical expenses, and by allowing households eligible for the standard deduction to self-certify their medical expenses and applying a standardized deduction, significant staff time will be saved. It’s anticipated that savings in staff time previously spent calculating medical expenses can be redirected to direct client services or other programs benefiting the clients served by HACSC.

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

Cost effectiveness.

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 of assisted households.

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

The MTW Activity applies to elderly and disabled family types.

**Impact Analysis
MTW Activity 1.u. Standard Deductions (HCV)**

Location: For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?
Yes. The MTW activity applies to all tenant-based units and properties with project-based vouchers.
Impact on the agency's finances (e.g., how much will the activity cost, and any change in the agency's per family contributions).
The change in annual total HAP is anticipated to be a reduction of \$53,556.
Impact on affordability of housing costs for affected families (e.g. any change in how much affected families will pay towards their housing costs.)
There are currently 5,370 households, 581 of which have medical expenses. 2,620 households will have no change. 2,495 households will have a decrease averaging \$4. 255 households will have an increase averaging \$54.
Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist);
No changes anticipated.
Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency).
No changes anticipated.
Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program.
No changes anticipated.
Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice.
Anticipated to enhance the agency's ability to meet the MTW statutory goal of cost effectiveness.
Impact on the rate of hardship requests and the number granted and denied as a result of this activity.
It is anticipated that some households experiencing an increase will submit hardship requests, but it is not yet known how many. This will be easier to assess after the first year of implementation.
Across the other factors above, the impact on protected classes (and any associated disparate impact).
None anticipated.
Implementation timeline.
Upon HUD approval of the MTW Supplement for FY starting 7/1/2024.
Description of a hardship policy, if needed. The MTW agency must adopt a written policy for determining when a requirement or provision of an MTW activity constitutes a financial or other hardship for the family. The agency must include this policy as an attachment to its MTW Supplement to the Annual PHA Plan. The agency may use a single hardship policy, as applicable, for multiple MTW waivers or develop different hardship policies for different MTW waivers as it finds appropriate.
<p>Elderly and disabled households for whom application of the standard deduction for medical expenses policy results in an increase in tenant share of rent may apply for the Medical Expense Hardship.</p> <p>Medical Expense Hardships must be requested by the household. To request a Medical Expense Hardship, the household must complete a Medical Expense Hardship Request form, complete a medical expense verification packet and may be asked to provide supporting documents, receipts, and/or contact information of healthcare providers that can verify. Staff will review and determine the total amount of unreimbursed allowable medical expenses. HACSC will approve all hardship requests from elderly and disabled households having verified eligible expenses above the threshold and for whom this MTW activity results in an increase in tenant share of rent.</p> <p>Approved Medical Expense Hardships will provide a medical expense deduction equal to the household's</p>

Impact Analysis
MTW Activity 1.u. Standard Deductions (HCV)

total annual unreimbursed allowable medical expenses that exceed 3% of household income. HACSC is using MTW authority to *continue* to use a 3% threshold in lieu of following HOTMA requirements at 5.611(a)(3) that increase the threshold to 10% including Hardship Exemptions (general and phased in relief) at 5.611(c)(1); 5.611(c)(1)(D); and 5.611(c)(2).

The approved Medical Expense Hardship will remain in force until the household's next scheduled reexamination.

A Medical Expense Hardship denial may be issued, and the household will be sent a denial letter, if the medical expenses submitted did exceed the threshold or included ineligible expenses. If the household believes the decision is in error, they may request a secondary review which much include supporting documentation sufficient for staff to verify their allowable expenses exceed the threshold.

As a reasonable accommodation, upon request, the Medical Expense Hardship Request form will be made available in an accessible format.

HACSC will provide residents with information about the Hardship policies on our webpage, in Annual Recertification packets, and upon request. HACSC will consider if a resident qualifies for a hardship exemption at the time of a potential termination of assistance that is due to this MTW activity. HACSC will make the determination of whether a financial or other hardship exists within a reasonable time after the family's request.

Medical Expense Hardship Policy
MTW Activity: 1.u. Standard Deduction (HCV)

Description of the MTW Activity

Under MTW Activity 1.u., Standard Deduction, the HACSC intends to establish a **standard deduction for medical expenses** applicable to all elderly and disabled households with medical expenses exceeding an established threshold. The standard deduction for medical expenses and the threshold at which it applies shall both be indicated in the HACSC Section 8 Administrative Plan. Eligible elderly and disabled families who claim medical expenses at or above the established threshold will be required to sign a self-certification.

This MTW activity doesn't impact the family's eligibility to receive the elderly/disabled and dependent deductions in accordance with §5.611(a)(1) – (a)(2).

For purposes of this MTW activity, medical expenses are defined in accordance with 24 CFR §5.603: Health and medical care expenses are any costs incurred in the diagnosis, cure, mitigation, treatment, or prevention of disease or payments for treatments affecting any structure or function of the body. Health and medical care expenses include medical insurance premiums and long-term care premiums that are paid or anticipated during the period for which annual income is computed.

For FY starting 7/1/2024, the proposed standard deduction for medical expenses is \$1,500 for elderly and disabled households with expenses at or above a \$1,500 threshold. HACSC will periodically adjust the amount of the standard medical deduction, adhering to HUD's methodology for calculating inflationary adjustments for the elderly/disabled family deduction, pursuant to a pending HUD Federal Register notice.

The MTW activity applies to all tenant-based units and properties with project-based vouchers.

Hardship Policy

- I. Elderly and disabled households for whom application of the standard deduction for medical expenses policy results in an increase in tenant share of rent may apply for the Medical Expense Hardship.
- II. Medical Expense Hardships must be requested by the household. To request a Medical Expense Hardship, the household must complete a Medical Expense Hardship Request form, complete a medical expense verification packet and may be asked to provide supporting documents, receipts, and/or contact information of healthcare providers that can verify. Staff will review and determine the total amount of unreimbursed allowable medical expenses. HACSC will approve all hardship requests from elderly and disabled households having verified eligible expenses above the threshold and for whom this MTW activity results in an increase in tenant share of rent.
- III. Approved Medical Expense Hardships will provide a medical expense deduction equal to the household's total annual unreimbursed allowable medical expenses that exceed 3% of household income. HACSC is using MTW authority to *continue* to use a 3% threshold

Medical Expense Hardship Policy
MTW Activity: 1.u. Standard Deduction (HCV)

in lieu of following HOTMA requirements at 5.611(a)(3) that increase the threshold to 10% including Hardship Exemptions (general and phased in relief) at 5.611(c)(1); 5.611(c)(1)(D); and 5.611(c)(2).

- IV. The approved Medical Expense Hardship will remain in force until the household's next scheduled reexamination.

- V. A Medical Expense Hardship denial may be issued, and the household will be sent a denial letter, if the medical expenses submitted did exceed the threshold or included ineligible expenses. If the household believes the decision is in error, they may request a secondary review which must include supporting documentation sufficient for staff to verify their allowable expenses exceed the threshold.

- VI. As a reasonable accommodation, upon request, the Medical Expense Hardship Request form will be made available in an accessible format.

HACSC will provide residents with information about the Hardship policies on our webpage, in Annual Recertification packets, and upon request. HACSC will consider if a resident qualifies for a hardship exemption at the time of a potential termination of assistance that is due to this MTW activity. HACSC will make the determination of whether a financial or other hardship exists within a reasonable time after the family's request.

**Housing Authority of the County of Santa Cruz
Impact Analysis: Activity 3b**

Waiver Number: 3.b.
Waiver Description: Alternative Reexamination Schedule for Households (HCV)
Describe the MTW activity (including what specifically the agency is proposing to waive), the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.
<p>HACSC proposes to waive 24CFR982.516(a)1, which requires that PHAs conduct reexaminations of family income and composition at least annually. HACSC proposes to conduct reexaminations of fixed income households at least every three years, and to conduct reexaminations of all other (non-fixed income households) at least every two years.</p> <p>Reducing the frequency of household certifications allows participants to keep more of their increases in income for a longer period of time. It also reduces the burden on both participants and Housing Specialists in acquiring, submitting, and processing paperwork. This change gives tenants a longer time with stable rent to allow for better financial planning and housing security. The paperwork burden on voucher holders will lessen if they do not have to submit income and employment changes annually. Tenants will have a greater ability to meet all basic needs as well as saving for the future. Reducing the frequency of reexaminations will also significantly reduce the staff time spent conducting these reexaminations, freeing up staff time to focus on asset building activities and other activities that align with our mission. The activity as proposed meets all of the applicable safe harbor requirements in the Operations Notice including (1) Reexaminations must occur at least every three years; (2) The agency must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more; (3) Agency must implement an impact analysis; and (4) Agency must include a hardship policy.</p>
Which of the MTW statutory objectives does this MTW activity serve?
<input checked="" type="checkbox"/> Cost effectiveness. <input checked="" type="checkbox"/> Self-sufficiency. <input checked="" type="checkbox"/> Housing Choice
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?
All 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?
All family types.
Please select the family types subject to this MTW activity.

**Housing Authority of the County of Santa Cruz
Impact Analysis: Activity 3b**

All family types.

Impact on the agency's finances (e.g., how much will the activity cost, and any change in the agency's per family contributions).

The proposed alternate reexamination schedule will impact agency finances. Specifically, the agency will experience cost savings through a reduction in the staff cost of conducting reexaminations and will experience increased costs through anticipated increases in the average subsidy payment (HAP) received by program families whose reexaminations are performed less frequently.

It is estimated that the proposed reexamination schedule will result in approximately 3,000 fewer reexaminations over the course of a year. This represents a 27% decrease in the workload of the Housing Programs Department, representing a potential savings of approximately \$500,000. While this savings is significant, it is likely to be more than offset by increases in average HAP payments to families.

It is much more difficult to estimate the potential increase in subsidy (HAP) associated with the proposed policy. HAP is inversely related to household income, meaning that when incomes go up, HAP goes down, and vice versa. In HACSC's programs, 38% of households have Social Security, SSI, and pensions as their only form of income. These households experience COLA increases every year, including large increases in recent years due to high inflation. For the remaining (non-fixed income) families, the cost of the proposed policy will be directly related to the average increase in household income, and the extent to which those increases are more or less than any increases in payment standard. Staff is currently in the process of evaluating various factors to estimate the potential increase in HAP related to the proposed policy. HACSC will closely monitor increases in HAP and may conduct annual reexaminations more frequently if needed.

Impact on affordability of housing costs for affected families (e.g. any change in how much affected families will pay towards their housing costs.)

The proposed policy will benefit families. Fixed income families will benefit because their portion of rent will not increase due to the modest COLAs they receive in between triennial reexaminations. Non-fixed income families will also benefit, and will retain all of the increased income associated from additional wages for up to two years before their next reexamination is conducted and their portion of rent is redetermined.

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

HACSC does not expect any impact to the amount of time families wait on the waiting list.

**Housing Authority of the County of Santa Cruz
Impact Analysis: Activity 3b**

Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency);
HACSC does not expect any impact to the agency's termination rate of families.
Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program
HACSC does not expect any impact to the agency's utilization rate.
Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice
The proposed policy will help meet the statutory goal of cost effectiveness by reducing HACSC workload and staffing costs and will help meet both the self-sufficiency and housing choice goals by allowing families to retain more of their income increases between reexaminations, removing disincentives for increasing income, and possibly resulting in families being able to save money, build assets, and resulting in more potential housing choices.
Impact on the agency's ability to meet the MTW statutory requirements;
The proposed policy will not impact HACSC's ability to meet statutory requirements.
Impact on the rate of hardship requests and the number granted and denied as a result of this activity.
HACSC does not expect any hardship requests as a result of this waiver.
Across the other factors above, the impact on protected classes (and any associated disparate impact).
The proposed policy is not expected to have any negative or disparate impact on any protected classes. The policy will benefit households.
Implementation timeline.
HACSC will implement this initiative upon approval of the MtW Supplement, Agency and Administrative Plan, with an anticipated operation period beginning 7/1/2023.
Description of a hardship policy, if needed. The MTW agency must adopt a written policy for determining when a requirement or provision of an MTW activity constitutes a financial or other hardship for the family. The agency must include this policy as an attachment to its MTW Supplement to the Annual PHA Plan. The agency may use a single hardship policy, as applicable, for multiple MTW waivers or develop different hardship policies for different MTW waivers as it finds appropriate.
HACSC has prepared Hardship Policy MTW Activity 3.b. - Alternative Reexamination Schedule for this activity which is included with the MTW Supplement submission.

Housing Authority of the County of Santa Cruz
Hardship Policy
MTW Activity 3.b. - Alternative Reexamination Schedule

Under MTW Activity 3.b., the Housing Authority of the County of Santa Cruz (HACSC) will implement an alternative reexamination schedule that will reduce the frequency of reexaminations to at least once every three years for families with fixed incomes and to at least once every two years for all other families.

Reducing the frequency of household certifications allows participants to keep more of their income as their income increases. It also reduces the burden on both participants and Housing Specialists in acquiring, submitting, and processing paperwork. This change gives tenants a longer time with stable rent to allow for better financial planning and housing security.

The MTW Operations Notice requires that HACSC implement a hardship policy for MTW Activity 3.b. HACSC will review this hardship policy during its intake and recertification process. While it is highly unlikely that any household's assistance will be terminated as a result of this activity, if this situation arises, HACSC will consider if a household qualifies for a hardship exemption at the time of potential termination of assistance that is due to this activity.

HUD requires that the hardship policy address the following potential hardship situations:

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

The family has experienced an increase in expenses, because of changed circumstances, for medical costs, childcare, transportation, education, or similar items.

To address these hardships, in between regular reexaminations, the HACSC will conduct interim adjustments to redetermine subsidy when the family experiences a qualifying event upon request of the household. Qualifying events are described in the HCV Administrative Plan, and include decreases in income, changes in household composition, changes to the contract rent, changes in expenses and other situations as applicable. When interim adjustments are conducted, HACSC may apply payment standards and utility allowances in effect at the time of the effective date of the adjustment. The HACSC will not conduct interim adjustments for increases in income unless they are associated with a change in household composition or at the request of the assisted family.

The interim policy will meet or exceed the safe harbor requirement of the Ops Notice and will not limit the number of interims that a family may receive.

The proposed MTW Activity will benefit families, postponing increases in their portion rent due to increased income, but continuing to process other eligible changes including household composition changes and decreases in rent due to decreased income. Therefore, HACSC does not expect any hardship requests as a result of this waiver. However, HACSC will conduct additional reexaminations upon request by the family, and no secondary level of review will be required.

H. Public Comment

Public Hearings

The Housing Authority held **two general public hearings** followed by a hearing for MTW Agency Specific and Safe Harbor Waivers:

1. An in-person **general public hearing** was held at the HACSC Administrative Office, 2170 41st Avenue, Capitola CA on **Wednesday, March 27, 2024 at 11:00 a.m.**
2. An in-person **Agency and Safe Harbor Waiver** hearing was also held at the HACSC Administrative Office, 2170 41st Avenue, Capitola CA on **Wednesday, March 27, 2024 at 11:30 a.m.**

Availability of Documents for Review and Public Notice Inviting Comment

The Agency Plan, HCV Administrative Plan, and MTW Supplement inclusive of Agency and Safe Harbor Waivers were available for review at the Housing Authority of the County of Santa Cruz public lobby located at 2160 41st Avenue, Capitola, California, from 8:00 a.m. to 4:30 PM Monday through Thursday. They were also available for review digitally at <https://hacosantacruz.org/general-information/agency-plans/>

Public notices were published in:

1. **The Register Pajaronian** on February 2, 9, 16, 23, and March 1, 8, 15, 22 2024
2. **The Santa Cruz Sentinel** on February 2, 9, 16, 23, and March 1, 8, 15, 22 2024

HACSC invited written comments on the Agency Plan, HCV Administrative Plan, and MTW Supplement inclusive of Agency and Safe Harbor Waivers, with a deadline for written comments at 4:00 PM on Tuesday, March 26th.

Public Comments Received

No Public Comments were received during the public comment period or at the public hearings.

Proof of Publication (attached)

1. Proof of Publication, Register Pajaronian
2. Proof of Publication, Santa Cruz Sentinel

Housing Authority of the County of Santa Cruz

The Housing Authority of the County of Santa Cruz (HACSC) has revised its Annual Agency and Housing Choice Voucher Program (HCV) Administrative Plans and has developed a draft Moving to Work (MTW) Supplement inclusive of Agency and Safe Harbor Waivers in accordance with all applicable Department of Housing and Urban Development (HUD) rules and regulations.

The Annual Agency Plan, HCV Administrative Plan, and MTW Supplement inclusive of Agency and Safe Harbor Waivers are available for review at the Housing Authority of the County of Santa Cruz public lobby, located at 2160 41st Avenue, Capitola, California. Lobby hours of operation are 8:00 AM to 4:30 PM Monday through Thursday excluding published holidays.

The Annual Agency Plan, HCV Administrative Plan, and MTW Supplement including Agency and Safe Harbor Waivers are also available for review digitally at <https://hacosantacruz.org/general-information/agency-plans/>.

HACSC invites written comments on the Agency Plan, HCV Administrative Plan, and MTW Supplement inclusive of Agency and Safe Harbor Waivers. Please address your comments to the Housing Authority of the County of Santa Cruz, Annual Plan Comments, ATTN: Executive Director, 2160 41st Avenue, Capitola, CA 95010. Comments may also be submitted via email to housing@hacosantacruz.org; for email submissions please use Subject Line: Annual Plan Comments. The deadline for written comments is **4:00 PM Tuesday, March 26, 2024**.

There will be two general public hearings followed by a hearing for MTW Agency Specific and Safe Harbor Waivers:

1. An in-person **general public hearing** will be held at the HACSC Administrative Office, 2170 41st Avenue, Capitola, CA on **Wednesday, March 27, 2024, at 11:00 AM**, followed immediately by
2. An in-person **Agency and Safe Harbor Waiver hearing** also held HACSC Administrative Office, 2170 41st Avenue, Capitola, CA on **Wednesday, March 27, 2024, at 11:30 AM or immediately upon conclusion of the general public hearing, as applicable**.

Persons with disabilities needing information in an accessible format or persons with limited English proficiency needing an interpreter to participate fully in the hearings should contact Courtney Byrd at 831-454-5901 or courtneyb@hacosantacruz.org in advance to make arrangements. The public is invited to attend.

Housing Authority of the County of Santa Cruz
Jenny Panetta, Executive Director

La **Autoridad de Vivienda del Condado de Santa Cruz (HACSC, por sus siglas en inglés)** ha revisado sus Planes Administrativos Anuales de la Agencia y del Programa de Voucher de Elección de Vivienda (HCV, por sus siglas en inglés) y ha desarrollado un borrador del Suplemento de Traslado al Trabajo (MTW, por sus siglas en inglés) que incluye las Exenciones de Agencia y de Puerto Seguro de conformidad con todas las normas y reglamentos aplicables del Departamento de Vivienda y Desarrollo Urbano (HUD, por sus siglas en inglés).

El Plan Anual de la Agencia, el Plan Administrativo HCV y el Suplemento MTW, incluidas las Exenciones de la Agencia y de Puerto Seguro, están disponibles para su revisión en el lobby público de la Autoridad de Vivienda del Condado de Santa Cruz, ubicado en 2160 41st Avenue, Capitola, California. El horario de atención del lobby es de 8:00 a.m. a 4:30 p.m. de Lunes a Jueves excluyendo los días feriados publicados.

El Plan Anual de la Agencia, el Plan Administrativo HCV, y el Suplemento MTW incluyendo las Exenciones de la Agencia y de Puerto Seguro también están disponibles para su revisión digital en <https://hacosantacruz.org/general-information/agency-plans/>.

PROOF OF PUBLICATION (2015.5 C.C.P.) STATE OF CALIFORNIA County of Santa Cruz

I am a resident of the State of California and over the age of eighteen years, and not a party to or interested in the above entitled matter.

I am the principal clerk of the publisher of The Register Pajaronian (The Pajaronian), published in the city of Watsonville, County of Santa Cruz, State of California, **Friday, and on line** for which said newspaper has been adjudicated a newspaper of general circulation by the **Superior Court of the County of Santa Cruz, State of California**, that the notice of which the annexed is a printed copy had been published in each issue thereof and not in any supplement on the following date(s):

February 2, 9, 16, 23, March 1, 8, 15, 22, 2024.

I declare, under penalty of perjury, that the foregoing is true and correct. This declaration has been executed **on March 22, 2024**.

THE PAJARONIAN
P.O. Box 1547
Watsonville, CA 95077


/s/ Juliana B. Pulcrano /
Legal Publications Specialist
The Pajaronian

Phone # (408) 709 3952
E-mail: jpulcrano@weeklys.com
Website: www.pajaronian.com

1 of 2

La HACSC invita a presentar comentarios por escrito sobre el Plan de la Agencia, el Plan Administrativo de HCV y el Suplemento de MTW, incluidas las Exenciones de la Agencia y de Puerto Seguro. Por favor dirija sus comentarios a Housing Authority of the County of Santa Cruz, Annual Plan Comments, ATTN: Executive Director (Autoridad de Vivienda del Condado de Santa Cruz, Comentarios sobre el Plan Anual, ATTN: Director Ejecutivo), 2160 41st Avenue, Capitola, CA 95010. Los comentarios también pueden enviarse por email a housing@hacosantacruz.org; para enviarlos por email, use el Asunto: Annual Plan Comments (Comentarios sobre el Plan Anual). La fecha límite para los comentarios por escrito es a las **4:00 PM del Martes, 26 de Marzo de 2024**.

Habrà dos audiencias pùblicas generales seguidas de una audiencia para las exenciones específicas de la agencia MTW y de Puerto Seguro:

1. Una audiencia pública general en persona se llevará a cabo en la Oficina Administrativa de HACSC, 2170 41st Avenue, Capitola, CA el **Miércoles, 27 de Marzo de 2024**, a las 11:00 AM, seguida inmediatamente por

2. Una audiencia en persona para la Agencia y la Exención de Puerto Seguro también se llevará a cabo en la Oficina Administrativa de HACSC, 2170 41st Avenue, Capitola, CA el **Miércoles, 27 de Marzo de 2024, a las 11:30 AM o inmediatamente después de la conclusión de la audiencia pública general, según sea el caso.**

Las personas con discapacidades que necesiten información en un formato accesible o las personas con dominio limitado del inglés que necesiten un intérprete para participar plenamente en las audiencias deben comunicarse con Courtney Byrd al 831-454-5901 o courtneyb@hacosantacruz.org con anticipación para hacer los arreglos. Se invita al público a asistir.

Autoridad de Vivienda del Condado de Santa Cruz
Jenny Panetta, Directora Ejecutiva
(Pub PAJ 2/2, 2/9, 2/16, 2/23, 3/1, 3/8, 3/15, 3/22)

**PROOF OF PUBLICATION
(2015.5 C.C.P.)
STATE OF CALIFORNIA
County of San Benito**

I am a resident of the State of California and over the age of eighteen years, and not a party to or interested in the above entitled matter.

I am the principal clerk of the publisher of the Free Lance, published in the city of Hollister, County of San Benito, State of California, **Friday, and on line** for which said newspaper has been adjudicated a newspaper of general circulation by the **Superior Court of the County of San Benito, State of California, under the date of June 19, 1952, Case Number 5330**, that the notice of which the annexed is a printed copy had been published in each issue thereof and not in any supplement on the following date(s):

February 2, 9, 16, 23, March 1, 8, 15, 22, 2024.

I declare, under penalty of perjury, that the foregoing is true and correct. This declaration has been executed **on March 22, 2024.**

**HOLLISTER FREE LANCE
615 San Benito Street, Suite 210
Hollister, CA 95023**


/s/ Juliana B. Pulcrano /

Legal Publications Specialist
Hollister Free Lance

Phone # (408) 709 3952
E-mail: jpulcrano@newsmedia.com
Website: www.sanbenito.com

**Housing Authority
of the County of
Santa Cruz**

The **Housing Authority of the County of Santa Cruz (HACSC)** has revised its Annual Agency and Housing Choice Voucher Program (HCV) Administrative Plans and has developed a draft Moving to Work (MTW) Supplement inclusive of Agency and Safe Harbor Waivers in accordance with all applicable Department of Housing and Urban Development (HUD) rules and regulations.

The Annual Agency Plan, HCV Administrative Plan, and MTW Supplement inclusive of Agency and Safe Harbor Waivers are available for review at the Housing Authority of the County of Santa Cruz public lobby, located at 2160 41st Avenue, Capitola, California. Lobby hours of operation are 8:00 AM to 4:30 PM Monday through Thursday excluding published holidays.

The Annual Agency Plan, HCV Administrative Plan, and MTW Supplement including Agency and Safe Harbor Waivers are also available for review digitally at <https://hacosantacruz.org/general-information/agency-plans/>.

HACSC invites written comments on the Agency Plan, HCV Administrative Plan, and MTW Supplement inclusive of Agency and Safe Harbor Waivers. Please address your comments to the Housing Authority of the County of Santa Cruz, Annual Plan Comments, ATTN: Executive Director, 2160 41st Avenue, Capitola, CA 95010. Comments may also be submitted via email to housing@hacosantacruz.org; for email submissions please use Subject Line: Annual Plan Comments. The deadline for written comments is **4:00 PM Tuesday, March 26, 2024.**

There will be two general public hearings followed by a hearing for MTW Agency Specific and Safe Harbor Waivers:

1. An in-person **general public hearing** will be held at the HACSC Administrative Office, 2170 41st Avenue, Capitola, CA on **Wednesday, March 27, 2024, at 11:00 AM**, followed immediately by

2. An in-person **Agency and Safe Harbor Waiver hearing** also held HACSC Administrative Office, 2170 41st Avenue, Capitola, CA on **Wednesday, March 27, 2024, at 11:30 AM or immediately upon conclusion of the general public hearing, as applicable.**

Persons with disabilities needing information in an accessible format or persons with limited English proficiency needing an interpreter to participate fully in the hearings should contact Courtney Byrd at 831-454-5901 or courtneyb@hacosantacruz.org in advance to make arrangements. The public is invited to attend.

Housing Authority of the
County of Santa Cruz
Jenny Panetta, Executive Director

La Autoridad de Vivienda del Condado de Santa Cruz (HACSC, por sus siglas en inglés) ha revisado sus Planes Administrativos Anuales de la Agencia y del Programa de Voucher de Elección de Vivienda (HCV, por sus siglas en inglés) y ha desarrollado un borrador del Suplemento de Traslado al Trabajo (MTW, por sus siglas en inglés) que incluye las Exenciones de Agencia y de Puerto Seguro de conformidad con todas las normas y reglamentos aplicables del Departamento de Vivienda y Desarrollo Urbano (HUD, por sus siglas en inglés).

El Plan Anual de la Agencia, el Plan Administrativo HCV y el Suplemento MTW, incluidas las Exenciones de la Agencia y de Puerto Seguro, están disponibles para su revisión en el lobby público de la Autoridad de Vivienda del Condado de Santa Cruz, ubicado en 2160 41st Avenue, Capitola, California. El horario de atención del lobby es de 8:00 a.m. a 4:30 p.m. de Lunes a Jueves excluyendo los días feriados publicados.

El Plan Anual de la Agencia, el Plan Administrativo HCV, y el Suplemento MTW incluyendo las Exenciones de la Agencia y de Puerto Seguro también están disponibles para su revisión digital en <https://hacosantacruz.org/general-information/agency-plans/>.

La HACSC invita a presentar comentarios por escrito sobre el Plan de la Agencia, el Plan Administrativo de HCV y el Suplemento de MTW, incluidas las Exenciones de la Agencia y de Puerto Seguro. Por favor dirija sus comentarios a Housing Authority of the County of Santa Cruz, Annual Plan Comments, ATTN: Executive Director (Autoridad de Vivienda del Condado de Santa Cruz, Comentarios sobre el Plan Anual, ATTN: Director Ejecutivo), 2160 41st Avenue, Capitola, CA 95010. Los comentarios también pueden enviarse por email a housing@hacosantacruz.org; para enviarlos por email, use el Asunto: Annual Plan Comments (Comentarios sobre el Plan Anual). La fecha límite para los comentarios por escrito es a las **4:00 PM del Martes, 26 de Marzo de 2024.**

Habrán dos audiencias públicas generales seguidas de una audiencia para las exenciones específicas de la agencia MTW y de Puerto Seguro:

1. Una audiencia pública general en persona se llevará a cabo en la Oficina Administrativa de HACSC, 2170 41st Avenue, Capitola, CA el **Miércoles, 27 de Marzo de 2024**, a las 11:00 AM, seguida inmediatamente por
2. Una audiencia en persona para la Agencia y la Exención de Puerto Seguro también se llevará a cabo en la Oficina Administrativa de HACSC, 2170 41st Avenue, Capitola, CA el **Miércoles, 27 de Marzo de 2024, a las 11:30 AM o inmediatamente después de la conclusión de la audiencia pública general, según sea el caso.**

Las personas con discapacidades que necesiten información en un formato accesible o las personas con dominio limitado del inglés que necesiten un intérprete para participar plenamente en las audiencias deben comunicarse con Courtney Byrd al 831-454-5901 o courtneyb@hacosantacruz.org con anticipación para hacer los arreglos. Se invita al público a asistir.

Autoridad de Vivienda del
Condado de Santa Cruz
Jenny Panetta, Directora Ejecutiva
(Pub HF 2/2, 2/9, 2/16, 2/23, 3/1,
3/8, 3/15, 3/22)

Santa Cruz Sentinel

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831-429-2415
scslegals@santacruzsentinel.com

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STATE OF CALIFORNIA

SS.

COUNTY OF SANTA CRUZ

Public Notice

I, the undersigned, declare:

That I am over the age of eighteen and not interested in the herein-referenced matter; that I am now, and at all times embraced in the publication herein mentioned was, a principal employee of the printer of the Santa Cruz Sentinel, a daily newspaper printed, published and circulated in the said county and adjudged a newspaper of general circulation by the Superior Court of California in and for the County of Santa Cruz, under Proceeding No. 25794; that the advertisement (of which the annexed is a true printed copy) was published in the above-named newspaper on the following dates, to wit:

02/02/2024, 02/09/2024, 02/16/2024, 02/23/2024,
03/01/2024, 03/08/2024, 03/15/2024, 03/22/2024

I declare under penalty of perjury that, the foregoing is true and correct to the best of my knowledge.

This 22th day of March, 2024 at Santa Cruz, California.



Signature

Legal No. 0006806573

The Housing Authority of the County of Santa Cruz (HACSC) has revised its Annual Agency and Housing Choice Voucher Program (HCV) Administrative Plans and has developed a draft Moving to Work (MTW) Supplement inclusive of Agency and Safe Harbor Waivers in accordance with all applicable Department of Housing and Urban Development (HUD) rules and regulations.

The Annual Agency Plan, HCV Administrative Plan, and MTW Supplement inclusive of Agency and Safe Harbor Waivers are available for review at the Housing Authority of the County of Santa Cruz public lobby, located at 2160 41st Avenue, Capitola, California. Lobby hours of operation are 8:30 AM to 4:30 PM Monday through Thursday excluding published holidays.

The Annual Agency Plan, HCV Administrative Plan, and MTW Supplement including Agency and Safe Harbor Waivers are also available for review digitally at <https://hacosantacruz.org/general-information/agency-plans/>.

HACSC invites written comments on the Agency Plan, HCV Administrative Plan, and MTW Supplement inclusive of Agency and Safe Harbor Waivers. Please address your comments to the Housing Authority of the County of Santa Cruz, Annual Plan Comments, ATTN: Executive Director, 2160 41st Avenue, Capitola, CA 95010. Comments may also be submitted via email to housing@hacosantacruz.org; for email submissions please use Subject Line: Annual Plan Comments. The deadline for written comments is 4:00 PM Tuesday, March 26, 2024.

There will be two general public hearings followed by a hearing for MTW Agency Specific and Safe Harbor Waivers:

1. An in-person general public hearing will be held at the HACSC Administrative Office, 2170 41st Avenue, Capitola, CA on **Wednesday, March 27, 2024, at 11:00 AM**, followed immediately by
2. An in-person Agency and Safe Harbor Waiver hearing also held HACSC Administrative Office, 2170 41st Avenue, Capitola, CA on **Wednesday, March 27, 2024, at 11:30 AM** or **immediately upon conclusion of the general public hearing, as applicable.**

Persons with disabilities needing information in an accessible format or persons with limited English proficiency needing an interpreter to participate fully in the hearings should contact Courtney Byrd at 831-454-5901 or courtneyb@hacosantacruz.org in advance to make arrangements. The public is invited to attend.

Housing Authority of the County
of Santa Cruz
Jenny Panetta, Executive Director

La Autoridad de Vivienda del Condado de Santa Cruz (HACSC, por sus siglas en inglés) ha revisado sus Planes Administrativos Anuales de la Agencia y del Programa de Voucher de Elección de Vivienda (HCV, por sus siglas en inglés) y ha desarrollado un borrador del Suplemento de Traslado al Trabajo (MTW, por sus siglas en inglés) que incluye las Exenciones de Agencia y de Puerto Seguro de conformidad con todas las normas y reglamentos aplicables del Departamento de Vivienda y Desarrollo Urbano (HUD, por sus siglas en inglés).

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**Autoridad de Vivienda del Condado
de Santa Cruz
Jenny Panetta, Directora Ejecutiva**

MTW CERTIFICATIONS OF COMPLIANCE**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING****Certifications of Compliance with Regulations:
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (07/02/2024), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA.

HOUSING AUTHORITY OF THE COUNTY OF SANTA CRUZ

CA072

MTW PHA NAME

MTW PHA NUMBER/HA CODE

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

ANDY SCHIFFRIN

CHAIR OF THE BOARD OF COMMISSIONERS

NAME OF AUTHORIZED OFFICIAL

TITLE

SIGNATURE

DATE

* *Must be signed by either the Chairperson or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.*