

Include Targeted Funding Programs (VASH, FUP, Mainstream, EHV) in MTW activities. (HCV)

The FWHA will include VASH, FUP, Mainstream and EHV elderly/disabled households in all MTW activities except Waiver 1.c and 1.d – Stepped Rent Policy. While these special program families will not be part of the Stepped Rent Demonstration, they will be eligible for triennial recertifications (if elderly or disabled household) and be included in the MTW activities, as eligible and with allowable hardships. The FWHA number of families participating in targeted funding is as follows:

Targeted Funding	Allocated	UML in CY 2021	Leased CY 2021
VASH	110	1279	96%
FUP	1	7	58%
Non-Elderly Disabled (NED)	75	854	95%
Mainstream 5	125	557	37%
EHV	46	2	0%
FYI	4 (up to 25)	32	100%

Core Questions - Agency Specific Waiver –Include Targeted Funding Programs (HCV)		
MTW Statutory Objective	Will apply as stated in each HCV waiver, except Waiver 1.d Stepped Rent Policy.	
Cost Implications	Will apply as stated in each applicable HCV waiver, except Waiver 1.d Stepped Rent Policy.	
Different policy by household status/family types/sites	Will apply as stated in each applicable waiver, except 1.d Stepped Rent Policy.	
Safe Harbor Waiver needed?	No	
Hardship Policy required?	Yes	
Does Hardship Apply to more than this activity	Yes	Applies to all HCV waivers excluding 1.d Stepped Rent Policy
Has the agency modified the hardship policy since the last submission	N/A	
Impact Analysis required?	Yes	
Impact Analysis apply to more than this MTW activity	Yes	Applies to all HCV waivers excluding 1.d Stepped Rent Policy
What has been accomplished or changed during the implementation	N/A	

Impact Analysis – Agency Specific Waiver – Include Targeted Funding Programs (VASH, FUP, NED, Mainstream 5, EHV and FYI) in certain MTW activities

Agency Specific Waiver – Include Targeted Funding Programs (VASH, FUP, Mainstream and EHV) in certain MTW activities (HCV)			
		Implementation Year (FYE 2021)	FY2022
1.	Impact on the agency’s finances	This activity is expected to reduce administrative costs annually and further self-sufficiency through fewer required recertifications	
2.	Impact on affordability of housing costs for affected families	None	
3.	Impact on the agency’s waitlist(s)	None	
4.	Impact on the agency’s termination rate of families	None	
5.	Impact on the agency’s current occupancy level in public housing and utilization rate in the HCV program	None	
6.	Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency and/or housing choice	This activity meets the statutory goals of cost effectiveness and self-sufficiency	
7.	Impact on the agency’s ability to meet MTW statutory requirements	This activity is expected to reduce administrative costs	

		<p>due to fewer required annual and interim recertifications but HAP costs may remain stagnant as family is not required to report increases in income annually. In FY2020, the FWHA processed 2,961 annual recertifications and 2,019 interim certifications. Annual recertifications will be reduced by 279 annually for elderly and disabled families for the next two years.</p>	
8.	Impact on the rate of hardship requests and the number granted and denied as a result of this activity	This is the initial year of implementation. The FWHA expects a hardship rate of 5%.	
9.	Impact on protected classes (and any disparate impact)	This activity should have no disparate impact on protected classes.	

Hardship Policy - Agency Specific Waiver – Include Targeted Funding Programs (VASH, FUP, NED, Mainstream 5, EHV and FYI) in certain MTW activities

A family participating in a targeted funding activity may request an exemption from an MTW activity in accordance with the established hardship policy for that activity. A family participating in targeted funding programs may also request a specific hardship due to one or more of the following reasons:

1. 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;
2. The family has experienced an increase in expenses, because of changed circumstances, for medical costs, childcare, transportation, education or similar items

If a hardship is granted, the PHA will remove the family from the MTW initiative for a period of 12 months. The hardship will be reassessed on **the earlier of** the next scheduled triennial recertification or within 12 months from the date the hardship was approved.

If the family disagrees with the denial of a hardship request, the family is entitled to and may request an informal hearing. The PHA will keep records of all hardship requests received and the results of those requests.