Fort Wayne Housing Authority (FWHA)
2025 Agency Specific Waivers
MTW Supplement

1) Verification of Income Valid for Up to 12 Months

a) Description
FWHA extends the validity period of verified income data up to 12 months, so long as the verified income remains accurate. This validity period applies to both initial certifications and recertification. This initiative aims to reduce costs and enhance cost-effectiveness in Federal expenditures. It also mitigates duplicative efforts required to validate information during the verification process.

b) Background
Many voucher holders experience leasing delays exceeding 120 days after voucher issuance, necessitating new verification documentation for the move-in file. This process frustrates landlords and voucher holders and can result in the loss of units due to landlords' inability to hold units during verification. Similarly, voucher holders experience barriers in receiving documentation verification for their recertifications.

Administrative burden arises when staff must issue letters requesting additional documentation due to incomplete or outdated submissions (e.g., paystubs that are no longer current, prompting a request for more recent ones). This process often requires multiple rounds of communication, including letters, emails, and phone calls, to assist the household in securing the necessary and accurate documentation. This process may also involve explaining the requirements and listening to participants' circumstances that make obtaining documentation challenging (e.g., transportation issues or barriers related to printing and mailing). The anticipated outcome is to facilitate timely move-ins and recertifications, while reducing unnecessary back-and-forth and efforts to obtain documentation that ultimately does not impact the rent calculation.

FWHA follows HUDs EIV verification requirements. If, during a full recertification and/or 120 days after move-in when the EIV income reports and IVT are reviewed, it is determined that the household income was un/underreported FWHA will follow the established EIV required actions, including recalculating income and offering the household a repayment agreement for any overpayment of HAP. Pre-verification consists of tenant declarations as well as a review of the most recent 50058.

Extending the income verification window to allow documents up to 12 months old significantly improves administrative efficiency within the HCV program. By reducing the need for repeated follow-ups with tenants and employers for updated documentation, staff can process files more quickly and consistently. This not only accelerates eligibility determinations and HAP contract execution but also supports timely certifications and unit moves. With fewer recalculations due to minor fluctuations in income, staff can shift focus toward quality control, compliance, and higher-value client service tasks. Standardizing documentation windows simplifies verification workflows and audit trails, making it easier to defend income determinations during reviews or audits. The policy is especially impactful for this high-volume housing authority, as it helps reduce backlogs and manage peak-period bottlenecks.

For participants, the policy creates a smoother and more accessible experience. Households no longer need to scramble for recent paystubs or employer letters, which is especially beneficial for individuals with limited digital access or inconsistent work histories. This approach reduces barriers for gig workers, seasonal employees, and others with fluctuating income, while avoiding the penalization of households experiencing short-term income shifts. A less burdensome documentation process can increase satisfaction and trust in the program, minimize missed deadlines that risk voucher loss, and reduce overall application fatigue. Programmatically, faster processing supports higher voucher utilization rates, more satisfied landlords due to quicker move-ins, and improved housing stability for tenants. By decreasing disputes and promoting equitable access, this policy aligns with broader goals of reducing administrative barriers and advancing housing equity.

c) Safeguarding Against Fraud

To ensure there is no waste, fraud, or abuse under the extended income verification policy, the agency will implement a layered integrity framework that prioritizes both prevention and detection. All households will be required to complete a signed self-attestation confirming that their income has not changed significantly since the date of the submitted documentation. Staff will be trained to identify inconsistencies or red flags that may trigger a request for more current documents or third-party verification. Additionally, the agency will conduct regular cross-checks using HUD's Enterprise Income Verification (EIV) system to compare reported income with employer-reported wages, Social Security benefits, and unemployment data. These safeguards will ensure that subsidy determinations remain accurate and that program resources are protected from misuse.

d) Statutory Objectives

- Cost-effectiveness
- Administrative efficiency

e) Cost Implications

- Decreased expenditures

f) Applicability

- This MTW activity applies to all assisted households

g) Hardship Requests

- No hardship requests were submitted in the most recent fiscal year

h) Prior Year Performance

- The Fort Wayne MTW agency received 0 hardship requests under this activity.

i) Regulation that would be waived if approved

- PIH Notice 2023-27; 24 CFR 982.516(a)(2); 24 CFR 960.259(c)(1)

2) Capping Rent Increases at Affordability

a) Description

This waiver requests permission to implement a cap on rent increases for Housing Choice Voucher (HCV) participants when the proposed increase would result in tenant rent burdens exceeding 40% of adjusted monthly income. The goal is to ensure continued affordability for assisted households while mitigating the risk of unsustainable Housing Assistance Payment (HAP) costs.

b) Background

Currently, 9% of our 2,577 voucher-assisted households are rent burdened, paying more than 40% of their adjusted monthly income toward rent. In 2024, 15% of rent increases resulted in such outcomes. Market rent pressures and policy changes—such as updating payment standards at all interims and the elimination of "hold harmless" protections—expose families to higher rent shares during even modest rent increases. A recent example includes the Biggs portfolio, where across-the-board increases proved unaffordable for tenants and had to be reversed after landlord pushback.

c) Statutory Objectives

This waiver supports statutory objectives of the Housing Choice Voucher program by:

- Promoting housing stability and affordability for low-income households
- Preventing excessive rent burden, displacement, and homelessness
- Maintaining efficient use of HAP funds by aligning tenant and program affordability

d) Cost Implications

While limiting rent increases may modestly reduce potential HAP cost increases tied to higher rents, it also protects the program from absorbing excessive or market-outlier rents. By capping increases, the PHA can maintain budgetary control and predictability, especially when payment standards are lowered or adjusted.

e) Applicability

This waiver would apply to all HCV households where a proposed rent increase would result in the tenant's share exceeding 40% of their adjusted income. It would not apply in cases where rent remains affordable or where hardship exemptions are granted.

f) Hardship Requests

Exceptions to the rent cap policy may be considered upon request, particularly for landlords who can justify the rent increase with current market comparables and/or operating cost increases. Tenants experiencing special circumstances may also request accommodations to avoid eviction risk.

g) Prior Year Performance

In the past year, the lack of a rent cap has contributed to a 15% incidence rate of rent burden post-increase. The current interim payment standard policy has exposed families to full rent hikes with no gradual phase-in, exacerbating affordability issues. The Biggs rent adjustment incident underscores the need for guardrails.

h) Regulation That Would Be Waived if Approved

This request seeks a waiver of 24 CFR § 982.505(d), which governs rent to owner and TTP calculations at reexamination without explicitly capping rent increases based on affordability. Approval would allow the PHA to limit rent increases that would result in the tenant portion exceeding 40% of adjusted monthly income, unless justified through an approved exception process.

3) Limiting Rent Increases to Once Per Year

a) Description
This waiver requests approval to restrict landlords to no more than one rent increase per assisted unit within a 12-month period. This policy aims to protect tenants from frequent, destabilizing increases and reduce the administrative burden of processing multiple requests on the same unit in a single year.

b) Background
In 2024, our agency processed 1,486 rent increase submissions. Of these, 147—nearly 10%—were duplicate submissions for units that had already received a rent increase earlier in the same calendar year. These repeat requests increase administrative workload, introduce financial instability for tenants, and create confusion around allowable rent thresholds.

c) Statutory Objectives
This waiver supports statutory HCV goals by:

- Enhancing housing stability for low-income tenants
- Ensuring predictability of housing costs
- Improving administrative efficiency and reducing processing time for staff

d) Cost Implications
Limiting rent increases to once annually can curb escalating HAP expenditures resulting from multiple annual increases per unit. It will also reduce processing costs and staff time spent on reviewing and negotiating repeated submissions for the same unit.

e) Applicability
This policy would apply to all units under HCV assistance, regardless of whether ownership or management changes occur. Landlords would still be required to provide adequate notice under program rules and local law. Exceptions may be considered in cases of documented, extraordinary cost increases or major rehabilitation.

f) Hardship Requests
Property owners who experience significant, unforeseen cost increases (e.g., major building system failures or utility cost spikes) may submit a hardship request for consideration. Requests must include documentation justifying the need for a mid-year rent adjustment.

g) Prior Year Performance
The 2024 data shows that approximately 9.89% of all rent increase requests were repeat submissions within the same year, signaling a trend that burdens staff and undermines

tenant housing security. This pattern supports the need for a clear, enforceable policy limiting such increases.

h) Regulation That Would Be Waived if Approved

This waiver seeks to modify provisions under 24 CFR § 982.507 and related policies, which allow for rent adjustments at the owner's request without a limit on frequency. The proposed change would restrict rent increase approvals to once per 12-month period per unit, unless an exception is granted.

4) Extension of HAP Contract Execution Deadline

a) Description

This waiver seeks approval to extend the standard timeframe for executing Housing Assistance Payment (HAP) contracts beyond the regulatory 60 calendar days from the start of the lease term, as outlined in 24 CFR § 982.305. Specifically, FWHA requests to adopt a 90-day standard timeframe, with flexibility to extend up to 180 days in cases of unforeseen or extenuating circumstances with written approval. This waiver ensures that families are not penalized due to delays beyond their control.

b) Background

Under current regulation, PHAs are prohibited from making HAP payments if the contract is not executed within 60 calendar days from the lease start. However, situations frequently arise that prevent timely execution, even with best efforts. These include documentation errors, delayed communications with landlords, or landlord-related medical emergencies. FWHA also experiences constraints caused by staffing shortages or unexpected employee absences, which can temporarily slow down processing.

c) Statutory Objectives

This waiver supports HCV program objectives by:

- Protecting tenant households from assuming housing costs due to administrative or landlord-related delays
- Ensuring continuity of service and housing stability
- Reducing avoidable lease failures, rent burdens, or forced relocations

d) Cost Implications

This waiver does not impose additional program costs, as FWHA will continue prioritizing timely execution within the current 60-day period. However, the flexibility to extend execution up to 90 or 180 days (with approval) will reduce the risk of unpaid HAP, emergency assistance costs, or administrative time spent processing terminated leases and relocations.

e) Applicability

This waiver will apply only in cases where:

- Delays in execution are due to errors or issues with lease or RTA documentation

- The property owner is medically unable to complete the process (e.g., hospitalization)
- FWHA experiences unexpected staff attrition or administrative delays
  Written approval will be required for any case exceeding the new 90-day standard.

f) Hardship Requests
This waiver is intended to prevent hardship for tenants. No additional hardship request mechanism is needed, as FWHA will proactively use this waiver to shield families from HAP ineligibility due to administrative delays outside their control.

g) Prior Year Performance
FWHA consistently strives to meet the 60-day contract execution requirement. However, past instances have shown that external challenges—particularly related to documentation errors and elderly landlords—can delay processing despite timely tenant and staff efforts. These challenges, while infrequent, demonstrate a clear need for flexibility without penalizing families.

h) Regulation That Would Be Waived if Approved
This waiver seeks relief from the strict enforcement of 24 CFR § 982.305(c), which currently prohibits HAP payments if the contract is executed more than 60 calendar days after the beginning of the lease term. The waiver would extend the permissible window to 90 calendar days, with a case-by-case extension up to 180 days upon written justification and approval.