

**Draft for Public Comment**  
**Rosenberg Housing Authority**  
**MTW Plan**  
**10/16/2020**

## **Vision for Rosenberg Housing Authority MTW Program**

The Housing Authority of the City of Rosenberg (RHA), has a vision for MTW that would achieve the three statutory objectives: cost effectiveness, self-sufficiency, and housing choice.

First, our vision is to show cost effectiveness by reducing the costs of administering the program. RHA would like to pursue simplifying the calculation of rent and reducing the number of interim recertifications. We are a small housing authority and our staff spend most of their time conducting interim recertifications. This a large challenge. We are excited to explore these options further in depth during the development and implementation of our MTW plan. Second, we have a vision for increasing self-sufficiency. RHA's vision is to increase the minimum rents and eliminate the utility allowance payments. We believe these changes will encourage more of our participants to move to work. We also believe that the rent simplification and reduction of interim recertifications may also serve to further self-sufficiency in addition to reducing costs to administer the program. We look forward to researching and developing policy changes that encourage self-sufficiency. Finally, we have a vision for increasing housing choice. In Rosenberg, we have challenges with concentration of voucher holders in certain areas and a lack of good landlords accepting our vouchers and preventing a range of choices for households with vouchers. We believe that MTW flexibilities such as the ability to increase the initial rent burden percentages, tenant caused damage mitigation fund, and offering landlord incentives can offer our families more choice in the marketplace. Further, the fungibility offered by MTW may allow us to pursue some of these innovations if the federal budget picture changes as our housing assistance payments budget currently is stretched.

Our overall vision for MTW participation is to create a housing authority that begins to develop innovative solutions about how to best overcome challenges in the local community through locally informed policies. We want to ask, how can we create policies that will both reduce costs while providing incentives for greater self-sufficiency while increasing housing choice? We believe that this vision is achievable with the flexibilities offered by MTW.

### **Statement of fair housing and other civil rights**

RHA takes seriously its obligations to fair housing and civil rights law and regulation.

Rosenberg is a majority minority city with over 63% of residents identifying as either Hispanic or a minority. RHA verifies that it will carry out the programs of the agency in conformity with title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973 and title II of the American with disabilities Act of 1990, and will affirmatively further fair housing by examining its programs and proposed programs and policies, identifying impediments to fair housing choice within those programs, and addressing those impediments in a reasonable fashion in view of the resources available and working with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require RHA's involvement and by maintaining records reflecting these analyses and actions. Currently the City of Rosenberg is not required to complete a Consolidated Plan. In 2019, RHA recognizing a lack of good affordable housing options for its residents in Rosenberg, requested and received the County's permission to provide services to the residents of the unincorporated area of the County. RHA's annual plan is consistent with the County's Consolidated plan.

### **Plan for Future Community/Resident Engagement**

Initially, RHA will follow the requirements from HUD for the development of this application. Subsequently, RHA will host a series of meeting with residents and other stakeholders to

understand what MTW means for RHA and discuss the future of the agency and how the MTW program can be used to further the goals of the agency. RHA will advertise the public hearing in the local paper of general circulation as well as post notices on our website, at our headquarters, and with City Hall. RHA will reach out to find residents interested in participating in an ongoing committee to discuss potential MTW reforms. RHA will also reach out to partnering agencies and local officials to discuss potential MTW reforms. These initial series of meetings will form the basis of a more detailed vision for developing the agency's MTW plans and provide advice and feedback as RHA begins to implement MTW. RHA would conduct affirmative outreach and engagement efforts by advertising public hearings in The Fort Bend Herald. RHA would also make local non-profit partners who regularly work with these groups aware of public meetings. RHA will comply with LEP regulations and provide translators as needed. It is our goal to allow and provide for full participation by all participants regardless of communication needs.

### **PHA Operating and Inventory Information**

RHA operates a voucher program with an authorized 453 units per month (5436 Unit Month Leased UML's per year). The housing authority has been able to maintain this number due to HUD held reserves, PHA held reserves and the additional HAP funding supplied by the CARES act. However, those funds are quickly being depleted and if the Per Unit Cost does not decrease, the housing authority will only be able to utilize approximately 5280 UML's a year. We do not operate any public housing programs.

The average income of voucher housing households is \$13,425. The average length of stay is 4 years. The average household size 2 persons. Of the 452 utilized vouchers, 104 are elderly and 119 are disabled. The racial composition of RHA's voucher program is 130 White, 320 Black

and 1 American Indian/Alaska Native. The ethnic composition of RHA's voucher program is 105 Hispanic and 345 Non-Hispanic. RHA does not anticipate any major changes to the demographics of the households it serves.

RHA faces no challenges in occupying its public housing units as it has none. Challenges in voucher leasing are impacted by low funding which results low payment standards and therefore, a low voucher acceptance rate. RHA hopes that MTW flexibilities will allow us to increase landlord participation in the HCV program and expand the options for RHA clients. RHA does have challenges with clients retaining housing. One issue that came up during the first resident meeting were challenges with newer voucher participants being lease compliant. The residents suggested perhaps the creation of a mentoring program to help newer/younger participants with program and lease compliance issues. We think this is an interesting idea, however, we also think that if we can simplify many of the program rules, program compliance will be easier. Mentoring for lease compliance could still be useful.

RHA faces challenges in serving special populations as we do not receive any special allocations of vouchers or funding to serve special populations. (applied for VASH and Mainstream Vouchers but have not received any yet) We have created a limited preference for homelessness in coordination with the Continuum of Care. We may use MTW flexibilities to be able to address this lack of resources for special population funding, but will need to discuss with the City and County to see if RHA vouchers can be leveraged by other grant and funding sources for special populations.

## **Plan for Local MTW Program**

RHA seeks to implement the following MTW flexibilities in addressing local needs.

1. **Cost Effectiveness:** RHA seeks to find ways to reduce the cost of administering the voucher program. Our staff are often overwhelmed by the amount of work that needs to go into interims and recertifications. We will seek to simplify the calculation of TTP and issues around voucher administration. We think that a number of the tenant rent policies in Appendix 1 of the MTW operations Notice are interesting to us and that we might seek to implement after getting input and feedback from residents, stakeholders, and the Board. We anticipate looking at what other MTW agencies have done in this regard and see if there are approaches that make sense for a program of our size. Specific activities that interest us are: minimum rents, tenant payment as a modified percentage of income, elimination of utility allowance payments, initial rent burden, elimination or standard deductions, self-certification of assets and changes to interim reexaminations.
2. **Self-Sufficiency:** RHA seeks to implement policy changes that will encourage and increase self-sufficiency. We do not have any additional funding at this time to create robust support services for our residents. However, we are hopeful that if we are successful in object #1. Cost-effectiveness, staff time may be freed up to pursue other objectives, like #2 and #3. We feel that increasing minimum rents eliminating utility allowance payments and other policy changes will encourage work and reduce the opportunity for participants to try to game the system.
3. **Housing Choice:** RHA seeks to implement changes to increase housing choice. As mentioned previously, we have seen a significant increase in our authorized jurisdiction. However, at this time have not seen an increase in the new locations increasing the housing

choice of our participants. Part of the challenge is that payment standards may need to be modified to work in very different parts of our jurisdiction. However, without the room in our voucher budget we are not able to increase the payment standards while still serving the most number of people. We will examine other ways to increase landlord participation that may not be as costly as raising payment standards. We will explore idea like a damage mitigation fund, one-time leasing incentives, vacancy payments and other ideas. We are also hopeful that due to the increase efficiency in administering the program, our staff will have more time to devote to sharing information about opportunity areas, cultivating relationships with landlords and other partner agencies.

### **Proposed Use of MTW Funds**

RHA does not request fungibility between Section 8 and Section 9 funds. RHA does not receive any Section 9 Funds. RHA does request flexibility within Section 8 funding.

RHA would like to create incentives in the HCVP program to increase the willingness of landlords to participate in our HCVP program. This will require fungibility within the voucher program. Currently the HAP budget is under enough pressure from rising HAP costs that we don't not anticipate using any flexibility any time soon, but wish to reserve that right should the funding picture change.

### **Evidence of Significant Partnerships**

Rosenberg Housing Authority is a part of the Fort Bend County Collaborative which is a collaborative of participating non-profit organizations and county agencies partnering to deepen their impact, reduce duplication of services and better serve the community. The Fort Bend County Collaborative membership includes: Fort Bend County Social Services; Fort Bend Behavioral Health Department; Fort Bend Senior Meals on Wheels; Second Mile Ministries; Fort

Bend HOPE and many others. We are hopeful that our participation in MTW will give us more flexibility in partnership with others.

## **Significant Dates and Milestones for the PHA's Local MTW Program**

### **Acceptance and Initial Resident and Public Engagement**

We hope that RHA would be admitted to the MTW Demonstration Program by February 2021.

The final MTW operation notice has already been posted so that is not a factor in our timing.

Prior to February 2021, invitations and notices would have already been posted soliciting participation on the MTW resident committee and the MTW stakeholder council. RHA would hold its first meetings within 30 days of notification of official MTW status (March 2021).

These groups would meet regularly over the next three months to help develop ideas and initiatives for consideration by the Board of Commissioners. (March 2021-May 2021). Staff would then brief the Board on the input and make staff recommendations for the study and further development of MTW initiatives.

Also, upon official notice of MTW status, RHA would contact its software vendor, Housing Pro, to determine what MTW clients it has and what software modifications may be already available and potentially at a reduced cost.

RHA's plan is that the MTW resident committee and MTW Stakeholder Council would continue to meet at least quarterly for two years after acceptance into the MTW Demonstration Program.

After two years, RHA will evaluate participation and may merge the groups or adjust the frequency of meeting. RHA believes that during the planning and startup of MTW these groups input and feedback will be important in setting the direction and providing input on the implementation phases of MTW.



MTW Plan development would begin in June 2021 with researching and refining proposed initiatives as well as conducting impact analyses. Once a plan is more fully developed, but still in draft, RHA would begin an even fuller engagement of the resident population with a series of resident meetings during July and August 2021. Following resident input, the draft would be published for public comment for at least 30 days prior to a public hearing in November 2021. RHA's Board of Commissioners would approve the final draft at either its November or December 2021 Board meeting. RHA would then submit to HUD and seek HUD approval for moving forward with its plans.

### **Implementation**

RHA hopes to begin implementation of its MTW activities beginning January 2022. It is unclear if computer programming changes will be required and if required, completed by January 2022. Some of the activities may not be fully implemented at the beginning of 2022 as we do not know exactly what will be proposed or accepted by the Board. RHA expects that all activities proposed and approved by HUD would be implemented within the first MTW Plan year.