

# PHA Name : Rosenberg

**PHA Code :** TX483

**MTW Supplement for PHA Fiscal Year Beginning :** (MM/DD/YYYY): 10/1/2022

**PHA Program Type:** Housing Choice Voucher (HCV) only

**MTW Cohort Number:** 1

**MTW Supplement Submission Type:** Annual Submission

## **B. MTW Supplement Narrative.**

The Rosenberg Housing Authority planned on reducing cost and achieving greater cost effectiveness by simplifying the rent process, reducing verification needing at an annual, and changing the re-exam schedule for families based on their income.

Due to a continued delay of the new PIC system, the housing authority has not been able to determine whether the new rent process will achieve cost effectiveness or not. We hope to try it next year if the system allows us to.

The housing authority did go ahead and change the re-exam schedule and that has resulted in fewer re-exams being done each month which has resulted in some cost effectiveness.

The housing authority also changed the process for interims which has greatly reduced the time and number of interims processed each month.

Due to the rising rent market. The housing authority went ahead and changed the Initial Rent Burden to 45%. This has helped our families compete with unassisted families in the open market. The success rate of our vouchers has not decreased as a result.

Because the housing authority is unable to submit 50058s to PIC due to some of the waivers being implemented. It has resulted in an administrative burden keeping track of all changes that are not being submitted to PIC at this time. It has also resulted in recertifications being classified as late. It will be burdensome to recreate all these 50058s and submit to PIC once it is ready. But we are trying to maintain a spreadsheet for all those families effected and once up and running, hope that we can catch up quickly.

The housing authority had planned on focusing on landlords this year, but has decided against that since many of the things we had wanted to do this past year has been placed on hold.

The housing authority plans on tweaking the few changes we were able to implement this year by changing the definition of a non-workable family, setting a minimum income for a family to be classified as work-able.

We will end the FSS program since we only have one participant and end the EID disallowance.

**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).**

<b>1. Tenant Rent Policies</b>	
b. Tiered Rent (HCV)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
f. Minimum Rent (HCV)	Currently Implementing
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Currently Implementing
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Plan to Implement in the Submission Year
o. Initial Rent Burden (HCV)	Currently Implementing
q. Imputed Income (HCV)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Plan to Implement in the Submission Year
u. Standard Deductions (HCV)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Currently Implementing
<b>2. Payment Standards and Rent Reasonableness</b>	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
<b>3. Reexaminations</b>	
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
d. Self-Certification of Assets (HCV)	Not Currently Implemented
<b>4. Landlord Leasing Incentives</b>	
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
<b>5. Housing Quality Standards (HQS)</b>	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Currently Implementing
<b>6. Short-Term Assistance</b>	
b. Short-Term Assistance (HCV)	Not Currently Implemented
<b>7. Term-Limited Assistance</b>	
b. Term-Limited Assistance (HCV)	Not Currently Implemented
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	
Increase Elderly Age (PH & HCV)	Not Currently Implemented
<b>9. Project-Based Voucher Program Flexibilities</b>	
a. Increase PBV Program Cap (HCV)	Not Currently Implemented
b. Increase PBV Project Cap (HCV)	Not Currently Implemented
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
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)	Not Currently Implemented
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
a.HCV Waive Operating a Required FSS Program (HCV)	Plan to Implement in the Submission Year
b. HCV Alternative Structure for Establishing Program	

Coordinating Committee (HCV)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>11. MTW Self-Sufficiency Program</b>	
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
<b>12. Work Requirement</b>	
b. Work Requirement (HCV)	Not Currently Implemented
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
<b>14. Moving on Policy</b>	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
<b>17. Local, Non-Traditional Activities</b>	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented
c. Housing Development Programs	Not Currently Implemented

**C. MTW Activities Plan that Rosenberg Plans to Implement in the Submission Year or Is Currently Implementing**

<b>1.f. - Minimum Rent (HCV)</b>
The housing authority did not implement this in the previous year except in the few cases that vouchers and rent estimators were sent to clients before knowing that PIC would not be able to handle the changes. Therefore, a handful of clients received the original proposed \$75 increase for the first year.
So, in order to promote self-sufficiency for our families and cost effectiveness for the RHA, the RHA plans to increase the minimum rent for families to \$100 over the next 2 years. We will start with a \$25 increase the first year and then increase by another \$25 the next.
This MTW activity serves the following statutory objectives: Self-sufficiency
This MTW activity serves the following statutory objectives: Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
Was unable to implement previously.
This MTW activity requires a Safe Harbor Waiver. The waiver was previously approved.
This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Rosenberg MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
minimum rent or minimum Total Tenant Payment (TTP) - \$75

**1.h. - Total Tenant Payment as a Percentage of Gross Income (HCV)**

The RHA will lower the percentage used to calculate rent to 27.5% of monthly gross income for all HCV participants and new admissions, and eliminate allowances and deductions (child care) with minimal impact on the participants' rent portion.
This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency
This MTW activity serves the following statutory objectives: Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types
Was not able to implement.
This MTW activity requires a Safe Harbor Waiver. The waiver was previously approved.
This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Rosenberg MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
Percentage of income will equal 27.50% of the Total Tenant Payment (TTP)
Income basis for calculating Total Tenant Payment is : This activity uses a different definition of income because we are using the following MTW waivers (check all that apply) 1.r. and/or 1.s. "elimination of deductions"

<b>1.n. - Utility Reimbursements (HCV)</b>
RHA will eliminate utility reimbursement (UR) payments when the utility allowance is greater than the TTP. Existing families receiving a UR payment will be given a 30 day notice before UR payments stop. This waiver will reduce the amount of fees the RHA must pay the bank each month when families do not cash their UR check and the administrative burden of calling families back when the checks are returned. Since the increase in minimum rent waiver would reduce the amount of families that qualify for UR, this will not result inn the agency's per family contribution increasing.
This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency
This MTW activity serves the following statutory objectives: Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
Was not implemented.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Rosenberg MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.

<b>1.o. - Initial Rent Burden (HCV)</b>

The RHA has changed the initial rent burden from 40% to 45% of monthly adjusted income allowing greater choice for the communities families week to reside in.
The result is an increased burden on the family should they utilize this, but the HAP will remain neutral.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity serves the following statutory objectives: Neutral (no cost implications)
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
The success rate for voucher issuance has remained steady despite rising rents due to participants being able to compete with the markets' requested rents. The families have been able to move from apartments to homes.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Rosenberg MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
Maximum income-based rent percentage 45.00%

<b>1.s. - Elimination of Deduction(s) (HCV)</b>
The RHA plans to eliminate dependent and child care deductions.
This MTW activity serves the following statutory objectives: Cost effectiveness Self-sufficiency
This MTW activity serves the following statutory objectives: Decreased revenue
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types
Unable to implement
This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Rosenberg MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
Following deduction(s) will be eliminated, modified, or added. Dependent allowance Unreimbursed childcare costs

<b>1.w. - Alternative Income Inclusions/Exclusions (HCV)</b>
The RHA eliminated requesting asset income when calculating rent.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives:

Neutral (no cost implications)
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
The re-exam process moves quickly because there are less verification that families must provide.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Rosenberg MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
Following inclusions or exclusions will be eliminated, modified, or added. Asset Income

<b>3.b. - Alternative Reexamination Schedule for Households (HCV)</b>
Provide an incentive to work for all families and reduce the burden on staff and families by reducing the frequency of income reexaminations.
The RHA defines workable families as families in which the head, co-head, spouse, or another adult is working and making at least \$7250/year and not a full-time student.
The RHA defines a non-workable family where the entire household is either disabled or elderly.
Elderly/Disabled families re-examined every 3 years if 90% of their income is fixed. Workable families re-examined every 2 years. Families with zero income, receive a minimum hardship or workable families with no wage income will be seen yearly.
Interim increases will not be conducted unless currently on a minimum hardship, zero income. Interim decrease will be conducted once per year for a decrease greater than 10%, or after 6 months of initial occupancy (including port-ins)
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Increased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
The amount of time devoted to interims has greatly decreased. Since word has gotten out, there are less interims being reported as well.
This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Rosenberg MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
Recertification Schedule is Other 3 years - Elderly/Disabled, 90% fixed income 2 years - workable family where full-time student is not the only source of wage income 1 year - no income, minimum hardship, workable family not working
Household may request 1 interim recertifications per year.
Interim Increases - family composition change (will not be classified as 1 interim), currently on minimum rent or zero income or zero wage income. Interim Decrease - 1/year if greater than 10%; after 6 months initial occupancy

**5.d. - Alternative Inspection Schedule (HCV)**

Some families will qualify for a triennial inspection only if the family has passed their initial 1 year inspection and first biennial inspection on the first visit. This will only be applicable if no tenant based deficiencies.

This MTW activity serves the following statutory objectives:  
Cost effectiveness

This MTW activity serves the following statutory objectives:  
Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households

Reduced the amount of inspections required each year.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Rosenberg MTW agency  
Received 0 hardship requests  
Approved hardship requests  
Denied hardship requests  
There is\are hardship requests pending.

**10.a.HCV - Waive Operating a Required FSS Program (HCV)**

The housing authority only has 1 required slot for FSS. The current family is not working and not working toward meeting their goals. Therefore, the RHA would like to eliminate the FSS program.

This MTW activity serves the following statutory objectives:  
Cost effectiveness

This MTW activity serves the following statutory objectives:  
Neutral (no cost implications)

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households

The one family still on the FSS will be contacted that the FSS will end as of September 30, 2022. The family will be given enough time to meet her goals and thus graduate from the program and be provided her escrow. Or is the goals are not met by September 30, 2022, she will forfeit her funds. The one family has not been working toward her goals for some time now.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Rosenberg MTW agency  
Received 0 hardship requests  
Approved hardship requests  
Denied hardship requests  
There is\are hardship requests pending.



<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<b>Safe Harbor Waivers seeking HUD Approval:</b> No Safe Harbor Waivers are being requested.

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>
<b>E.1</b>	<b>Agency-Specific Waiver(s) for HUD Approval:</b>  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, Agency-Specific Waivers may be requested.  No Agency-Specific Waivers are being requested.
<b>E.2</b>	<b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b> MTW Agency does not have approved Agency-Specific Waivers

<b>F.</b>	<b>Public Housing Operating Subsidy Grant Reporting.</b>
<b>F.1</b>	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.

<b>Federal Fiscal Year (FFY)</b>	<b>Total Operating Subsidy Authorized Amount</b>	<b>How Much PHA Disbursed by the 9/30 Reporting Period</b>	<b>Remaining Not Yet Disbursed</b>	<b>Deadline</b>
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<b>G.</b>	<b>MTW Statutory Requirements.</b>	
<b>G.1</b>	<b>75% Very Low Income – Local, Non-Traditional.</b> 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.	
	<b>Income Level</b>	<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
	80%-50% Area Median Income	
	49%-30% Area Median Income	
	Below 30% Area Median Income	
	Total Local, Non-Traditional Households	<b>0</b>

\*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.

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>
MTW agency established a rent reform policy to encourage employment and self-sufficiency	

<b>G.3</b>	<b>Substantially the Same (STS) – Local, Non-Traditional.</b>	
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	# of unit months	
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	# of unit months	

**Number of units developed under the local, non-traditional housing development activity that were available for occupancy during the prior full calendar year:**

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>
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.	

Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	
2 Person	
3 Person	
4 Person	
5 Person	
6+ Person	
Totals	0

H.	Public Comment
	Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.
	No additional public hearing was held for an Agency-Specific Waiver and/or Safe Harbor waiver

I.	Evaluations.
	No known evaluations.