

**STAUNTON REDEVELOPMENT AND HOUSING
AUTHORITY**

(VA023)

MOVING TO WORK COHORT #5

MTW FLEXIBILITY II COHORT

Released By:

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STAUNTON REDEVELOPMENT AND HOUSING AUTHORITY

Moving to Work, Cohort #5 (Flexibility Cohort II)

TABLE OF CONTENTS

PART I: MTWPLAN

Executive Summary and Introduction

Background Information: Staunton Redevelopment and Housing Authority HUD and the MTW Program MTW Cohort #5 (Flexibility Cohort # II)

- a. Vision for the Local MTW Program
- b. PHA Operating and Inventory Information
- c. Plan for Local MTW Program

Administrative Flexibilities

- a. MTW Cohort #5 Proposed Activities
- b. Proposed Use of MTW Funds
- c. Plan for Future Community/Resident Engagement
- d. Other Incentives and Initiatives

PART II: APPENDICES

APPENDIX I: MTW Certifications of Compliance

APPENDIX II: Public Process Documentation

APPENDIX III: Required Standard Forms

APPENDIX IV: Other Supporting Documentation

STAUNTON REDEVELOPMENT AND HOUSING AUTHORITY

MTW Cohort #5; Flexibility Cohort II

EXECUTIVE SUMMARY

Staunton is an independent city in the U.S. Commonwealth of Virginia. As of the 2020 census, the population was 25,750. In Virginia, independent cities are separate jurisdictions from the counties that surround them, so the government offices of Augusta County are in Verona, which is contiguous to Staunton. Staunton is a principal city of the Staunton-Waynesboro Metropolitan Statistical Area, which had a 2010 population of 118,502. Staunton is known for being the birthplace of Woodrow Wilson, the 28th U.S. president, and as the home of Mary Baldwin University, historically a women's college. The city is also home to Stuart Hall, a private co-ed preparatory school, as well as the Virginia School for the Deaf and Blind. It was the first city in the United States with a fully defined city manager system. (From Wikipedia.)

The Staunton Redevelopment and Housing Authority (SRHA), from the Board of Commissioners, through the Housing Authority leadership, and throughout the staff is highly committed to this application to participate in the MTW Cohort # 5 Demonstration Program, also described by HUD as MTW Flexibility II Cohort. (The concept of "Flexibility" is already being tested in a prior MTW Demonstration Program Cohort involving larger Housing Authorities.)

The previous Flexibility Cohort (Flexibility Cohort I) had a different impact on HUD and its PHAs as opposed to this Flexibility Cohort II, because there was a smaller number of much larger PHAs, so the research, outcomes and findings affected fewer but much larger PHAs.

Flexibility Cohort II, however, has the potential for a more dramatic impact throughout HUD Public Housing/HCV PHAs given that more than 80% of the approximately 3,500 PHAs nationwide fall within the Category of small to medium-sized Housing Authorities with fewer than 1,000 total Section 8 and Section 9 units. Consequently, understanding the significance of this Cohort makes it an exciting endeavor to provide the research, outcomes, and findings for a dramatically larger proportion of HUD PHAs.

At the same time, however, it must be acknowledged that the range of Flexibility is more restricted in this Cohort in comparison to Flexibility Cohort I. Inevitably, large PHAs have tremendous flexibility with reference to staffing and financial resources. Small and medium-sized PHAs, however, have much more rigid constraints on their opportunities to promote Flexibility.

In the case of small to medium-sized Housing Authorities, there are many functions that cannot be dismissed in the management of a Housing Authority no matter what size. Accepting and approving applications for housing; certifying and recertifying tenants for housing; inspecting units; and all of the other basic responsibilities in operating a Housing Authority cannot be dismissed even with Regulatory Waivers.

As a high functioning PHA and as a highly creative PHA, the SRHA relishes the opportunity to contribute to this body of knowledge.

MTW Plan-Part I

INTRODUCTION

Background: Moving to Work Demonstration Program and MTW Expansion

The Moving to Work (MTW) Demonstration Program allows PHAs to design and test innovative, locally designed housing and self-sufficiency strategies for low-income families by permitting PHAs to use assistance received under Sections 8 and 9 of the United States Housing Act of 1937, as amended, 42 U.S.C. 1437, et seq., (1937 Act) more flexibly and by allowing certain exemptions from existing public housing and HCV program rules, as approved by the U.S. Department of Housing and Urban Development.

The MTW Demonstration Program was originally authorized by Section 204 of the Omnibus Consolidated Rescissions and Appropriations Act of 1996, P.L. 104-134; 42 U.S.C. 1437f note (1996 MTW Statute). Section 239 of the Fiscal Year 2016 Appropriations Act, P.L. 114-113 (2016 MTW Expansion Statute), authorizes HUD to expand the MTW Demonstration Program by designating an additional 100 PHAs (hereafter, the "MTW Expansion"). The 2016 MTW Expansion Statute provides that PHAs selected as part of the MTW Expansion must be high performers, meet certain size and Rental Assistance Demonstration (RAD) requirements, and represent geographic diversity across the country. All PHAs selected as a part of the MTW Expansion must follow the selection notice for their applicable cohort. All PHAs selected as a part of the MTW Expansion must also follow the MTW Operations Notice, which governs the participation of all PHAs in the MTW Expansion, establishes program structure, details terms and conditions, and provides all available MTW waivers and associated activities.² Eligibility and selection criteria under this Notice are based on the requirements of the 1996 MTW Statute, the additional criteria in the 2016 MTW Expansion Statute, and other indicators that ensure qualified PHAs are selected. These criteria will also allow HUD to test important policy priorities of interest to the Department and the assisted housing community.

Public Housing Authorities (PHAs) with 1,000 or fewer combined units of public housing and Housing Choice Voucher (HCV) units will be selected for the fifth cohort of the Moving to Work Expansion (MTW), which will test the overall effects of MTW Flexibility on a PHA and the residents it serves, with a particular focus on administrative efficiencies (MTW Flexibility II Cohort). Interested PHAs that meet the eligibility criteria established by HUD may submit an application package to HUD to be considered for MTW Status. If the number of qualifying applications exceeds the number of awards currently available for this Cohort, HUD will select Applications by lottery weighted on a geographical basis.

MTW Cohort #5 is an exceedingly important matter for study for HUD and housing in the United States. As indicated previously, almost 3,000 PHAs across the United States fit into the same-sized category as the SRHA, so developing and applying flexible and innovative solutions to operating this large number of agencies could have a huge impact in the field of public Housing.

The MTW Flexibility II Cohort of the MTW Expansion will assess the overall effects of MTW flexibility on a PHA and the residents it serves, with emphasis on how/whether MTW PHAs seek to achieve administrative efficiencies through MTW. The MTW Flexibility II Cohort will consist of PHAs with 1,000 or fewer aggregate authorized public housing and HCV units.

PHAs seeking MTW designation in the MTW Flexibility II Cohort of the MTW Expansion will submit an MTW Plan and application package to HUD by the due date of December 8, 2023.

Upon receiving the MTW Plan and Application Packages, HUD will ensure that the MTW Plan and application packages are eligible and complete. If there are enough MTW Expansion slots available for all of the PHAs that were found to have submitted eligible and complete application packages, HUD will offer MTW designation under the MTW Flexibility II Cohort of the MTW Expansion to all of the eligible applicant PHAs. If there are more applicant PHAs with complete and eligible application packages than MTW Expansion slots available, HUD will conduct a lottery of all eligible and complete MTW Plan and application packages. Those applicant PHAs selected through the lottery will be offered MTW designation under the MTW Flexibility II Cohort of the MTW Expansion. If a lottery is conducted, the applicant PHAs not selected through the lottery will not receive MTW designation under the MTW Flexibility II Cohort of the MTW Expansion but may apply for any future opportunities to join MTW under which they are eligible. All PHAs that submit an MTW Plan and application package under this Notice will be notified of their status (selected, not selected, not eligible/no complete application) after selections have been made.

Inclusion of a program or initiative in the MTW Plan and application package does not constitute approval of the program or initiative. If selected and designated as an MTW PHA, the PHA must pursue approval of all programs and initiatives through the MTW Supplement and all processes described in the MTW Operations Notice. This includes the approval of the waivers and associated activities in Appendix I of the MTW Operations Notice and the approval of any Agency-Specific Waivers and/or Cohort-Specific Waivers.

SRHA Vision and Mission

The SRHA, provides safe and affordable housing to members of its community to enhance quality of life, promote economic opportunity, and offer a suitable living environment free from discrimination. Through commitment to staff excellence, SRHA is dedicated to treating all participants with dignity and respect. The SRHA seeks to establish and constantly explore new opportunities to partner with other communities and agencies to expand additional affordable housing opportunities for low income, elderly, non-elderly disabled, homeless, veteran and family populations.

The SRHA will use the additional resources and regulatory and budget flexibility that comes with MTW status to further improve the Public Housing and HCV Program, including facilitating increased resident services, housing development opportunities, and landlord involvement.

In order to accomplish this, the SRHA is making substantial efforts and will continue to implement initiatives to improve technology, customer service and communication among staff, with residents and with HCV landlords.

In support of this, the SRHA is applying to HUD for selection as a MTW Cohort #5 Housing Authority. The Staunton Redevelopment and Housing Authority is uniquely positioned to work very effectively with HUD in this endeavor.

As a MTW Cohort #5 Housing Authority, Staunton Redevelopment and Housing Authority will continue to enact policies and procedures that will build strong relationships with its residents and resident organizations, its local landlords, and staff members that will be cost effective, provide housing choice for qualifying tenants, and support tenants and their families in achieving self-sufficiency.

SRHA's Plan for Implementing its MTW Demonstration Program

In implementing MTW Cohort #5, the Staunton Redevelopment and Housing Authority will apply HUD's key principles for the expansion to: (1) Simplify, (2) Learn, and (3) Apply. As with other PHAs, SRHA has had to operate in an environment where intervention and resources have been nebulous. Working with HUD, its MTW advisers and with HUD's assigned Technical Assistance experts, the SRHA will establish an encouraging and supportive environment for its residents, while at the same time developing and implementing Flexibilities that will allow the Housing Authority to operate more efficiently and effectively.

Staunton Redevelopment and Housing Authority brings a unique and comprehensive perspective to the table. The SRHA has worked hard on its relationships with its residents who live in both public and leased housing, its applicants, and its landlords.

Working hand-in-hand with HUD, the SRHA will (1) Re-evaluate its staffing plan and Chart of Organization; (2) Assess how to better work with its resident organizations and tenants; (3) Evaluate how to develop better, more efficient and more effective relationships with its landlords; and (4) Determine how best to target its resources, including staffing and financial resources to the greatest benefit of residents, staff and housing development possibilities.

As part of this process, the SRHA will assess all applicable waivers and associated activities in Appendix I of the MTW Operations Notice and will work with HUD on the approval of any Agency-Specific Waivers and/or Cohort-Specific Waivers, selecting from the following list:

- Tenant Rent Policies - 1(i) and 1(j): Alternative Utility Allowance (PH); Alternative Utility Allowance (HCV);
- Tenant Rent Policies - 1(r) and 1(s): Elimination of Deduction(s) (PH); Elimination of Deduction(s) (HCV);
- Tenant Rent Policies - 1(t) and 1(u): Standard Deductions (PH); Standard Deductions (HCV);
- Reexaminations - 3(a) and 3(b): Alternative Reexamination Schedule for Households (PH); Alternative Reexamination Schedule for Households (HCV);
- Reexaminations - 3(c) and 3(d): Self-Certification of Assets (PH); Self-Certification of Assets (HCV);
- Housing Quality Standards (HQS) - 5(d): Alternative Inspection Schedules (HCV);

- Project-Based Voucher Program Flexibilities - 9(c): Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement;
- Project-Based Voucher Program Flexibilities - 9(d): Alternative PBV Selection Process (HCV).

It is understood that the expression of interest in these MTW waivers and associated activities in this section will not be binding on the SRHA should it receive MTW designation under the MTW Flexibility II Cohort of the MTW Expansion. The selection of MTW waivers and associated activities by the SRHA is for informational purposes only and will not be a factor in selection of PHAs for the MTW Flexibility II Cohort.

The Staunton Redevelopment and Housing Authority, Housing Team

As already indicated, the SRHA has assembled an outstanding team perfectly suited to working with HUD to address the HUD MTW Cohort #5 demonstration Program.

The Team members who will be most involved in the implementation of the Moving to Work, Cohort #5 are:

Mr. Nehemias Velez, COS, CPO., Executive Director

Lance Allen, Deputy Director, Accounting

Ms. Audra Hutchens, COS, HCV Specialist, Real Estate License, Housing Choice Manager

Ms. Alora Howard, Occupancy Specialist

Ms. Constance Piller, Multi-Family Housing Specialist, Real Estate License, Multi-Family Property Manager

Mark Allen, Certified UPCS and NSPIRE Inspector, Maintenance Supervisor

MTW Plan—Part II

The Staunton Redevelopment and Housing Authority will work closely with HUD in establishing an effective MTW relationship and in setting up its Waivers and Policies, and in providing data and information to HUD to ensure the effectiveness of the research process.

Our own assessment of the Waivers and what we could potentially accomplish with the Waivers includes:

Tenant Rent Policies - HCV

Alternative Utility Allowance

- An alternative utility allowance would decrease staff time needed to compile and enter the current number of 8 utility allowance schedules each year.
- Simplifying rent reasonableness process.

Elimination/Standard Deduction

- As far as medical expenses for deduction, it is not time efficient to dig through and accurately count every statement and receipt provided by a family. A standard medical deduction would eliminate this.

Reexaminations – HCV

Alternative Reexamination Schedule for Households

- A triennial annual reexamination schedule would drastically free up time for staff to perform other duties (i.e. landlord outreach).
- Doing interim certifications only when there is a household composition change, or an income decrease, or a 20 % increase of income giving families an opportunity to save funds to pay off debt, further their educations, save for a down payment on a home, etc.

Self-Certification of Assets

- Allowing families to self-certify their assets at their eligibility and annual reexaminations would save time currently spent on chasing down documentation and calculating the amounts.

HQS/NSPIRE

Alternative Inspection Schedules

- Doing triannual HQS/NSPIRE inspections would free up staff time to do other duties (if tenants are required to inform the PHA of any issues so that the PHA could evaluate as needed).
- Flexibility in allowing RVIs could also be beneficial when needed.

Landlord Leasing Incentives

Tenant Based Assistance

- Vacancy Loss, Damage Claims, and Other Landlord Incentives. Allowing these flexibilities would also ease staff time as keeping landlords and attracting landlords would be more attainable.

Project-Based Voucher Program Flexibilities

Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement

- PHA can operate and increase the capped number of allowable PBVs for a PHA from 20% to 50%.
- Elimination of the PBV selection process and establishing an alternative selection process.
- Limit portability for PBV units.
- The PHA may offer an HCV voucher to an applicant that does not qualify for a PBV unit but qualifies for a HCV voucher.

MtW Self-Sufficiency Program/FSS Waiver

FSS Program with MtW Flexibilities based on the Housing Authority having the FSS grant)

- Alternative family selection procedures.
- Modify contract of participation.
- Policies for addressing increasing in family income.

Our preferred waivers we would like to highlight in our MTW Plan are:

- 1j – Alternative Utility Allowance (HCV)
- 1u – Standard Deduction (HCV)
- 3b – Alternative Reexamination schedule for Households (HCV)
- 3d – Self Certification of Assets (HCV)
- 5d – Alternative Inspection Schedule (HCV)
- 9d – Alternative PBV Selection Process

a. Plan for Future Community/Resident Engagement

The SRHA will continue to engage assisted households in its low- income and affordable housing programs, as well as the broader community and stakeholders, in the implementation and development of its local MTW program.

As SRHA does in all of its programs, as a MTW Cohort# 5 designee, the WHA will continue with its entire engagement efforts with the local community, including outreach to racial and ethnic minorities, persons with limited English proficiency, persons with disabilities, families with children and groups representing such persons.

In addition, the SRHA will work closely with landlords to build additional HCV opportunities for HCV residents.

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b. PHA Operating and Inventory

Housing Programs

HCV Units

The SRHA currently provides tenant-based rental assistance to 243 HCV families. The number of households fluctuates throughout the year, as families are removed and added to the program due to new admissions, portability, and termination. The SRHA currently has approximately 1,061 HCV applicants on its waiting lists. The SRHA also has 577 2BRs PBVs and 537 3BRs PBVs applicants on its waiting list. The HCV waiting list was last opened on October 11, 2022 and applicants are selected in order since the SRHA has no preferences. The PBV waiting list was opened on June 06, 2023. Applicants are selected in order since the SRHA has no preferences.

VASH Units

The SRHA currently has 5 Veterans Affairs Supportive Housing (VASH Vouchers) and applied for additional VASH Vouchers on September 05, 2023.

Tenant Protection

The SRHA currently has 1 Tenant Protection Voucher.

Mainstream

The SRHA does not have Mainstream Vouchers, but it intends to apply when they become available to better serve the community.

Rental Assistance Demonstration Program (RAD)

The SRHA converted all its 150 Public Housing units in October 2015 to PBRA RAD. The SRHA has 150 PBRA RAD units in 21 buildings. The SRHA has 70 1BR units, 40 2BRs units, 22 3BRs units, 12 4BRs units, and 6 5BRs units in its PBRA RAD program. The waiting list for these units remains open.

c. Plan for Local MTW Program

Staunton Redevelopment and Housing Authority's MTW Cohort #5 Application is taking place in the context of what the Housing Authority has systematically done over the years to make things work effectively with residents, landlords, and staff. The SRHA looks forward to the opportunity to implement Regulatory Waivers and other activities that will allow the SRHA to function more effectively, build in Flexibility and efficiencies to improve circumstances for residents, landlords and staff.

In addition to the HUD-identified activities to be approved, based on experience, the SRHA will continue to implement improvements to its Landlord relations including: Streamlining Operations through Technology, Education, Outreach and Communication.

To facilitate technological solutions, better customer service and better communications, SRHA will consider implementing some of all of these following strategies:

- Ensuring utilization of its housing software system that supports the housing programs and the MTW Cohort #5 initiative;
- Consideration of developing a Landlord Portal providing access to all forms and documents;
- Direct Deposits;
- Real-time inspections;
- Tenants potentially moved in same day;
- Established Landlord Advisory Committee;
- Pictures of Units and amenities to help market rental units.

The SRHA is fully compatible with HUD's Fair Housing and Civil Rights Initiatives

d. Proposed Use of MTW Funds

Staunton Redevelopment and Housing Authority will use all resources and where appropriate, fungibility to enhance housing and program opportunities for its residents and will use the MTW Cohort #5 status as a way to provide top level housing resources in coordination with an expanded and satisfied array of opportunities for residents, landlords, staff and added housing opportunities.