



**FY26**

# **MOVING TO WORK SUPPLEMENT**

**STAUNTON REDEVELOPMENT  
& HOUSING AUTHORITY**

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## A. PHA Information

<b>A.1</b>	<b>PHA Name</b>	Staunton Redevelopment & Housing Authority
	<b>PHA Code</b>	VA023
	<b>MTW Supplement for PHA Fiscal Year Beginning</b>	01/01/2026
	<b>PHA Program Type</b>	HCV
	<b>MTW Cohort Number</b>	5
	<b>MTW Supplement Submission Type</b>	Annual Submission

## B. Narrative

- B.1** The Staunton Redevelopment and Housing Authority (SRHA), created following Title 36 of the Code of Virginia, is a political subdivision of the Commonwealth of Virginia. The SRHA was organized on March 9, 1961, and since then has been committed to housing low-income families by treating them with dignity and respect in the Staunton and Augusta counties of Virginia. The mission of the SRHA is to provide 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. The SRHA administers the Housing Choice Voucher (HCV) program through the Office of Public and Indian Housing and Multifamily Housing through the Office of Housing.

The SRHA intends to (1) Re-evaluate its staffing plan to gain better administrative efficiencies; (2) Assess how to better work with its resident organizations and participants to foster clear communication channels and increase housing choices; (3) Evaluate how to develop better, more efficient and more effective relationships with landlords; and (4) Determine how best to target resources, including staffing and financial resources to the greatest benefit of participants, staff, and landlords.

### Short-Term Goals (2026–2028)

#### 1. Farrier Court Expansion & Rehabilitation

The SRHA will initiate pre-development activities at the RAD PBRA Farrier Court site, including the selection of a development partner, planning and design, and pursuit of LIHTC and gap financing. The project aims to modernize the site, increase the number of affordable units, and incorporate universal design features to accommodate seniors and persons with disabilities.

#### 2. Project-Based Voucher Expansion (VASH, Elderly, and Disabled)

The SRHA plans to expand the use of Project-Based Vouchers (PBVs), with priorities for homeless veterans, elderly households, and people with disabilities. The SRHA will pursue increased PBV allocations in both newly constructed and rehabilitated units, while leveraging MTW authority to exceed the standard PBV cap when aligned with local housing needs.

#### 3. Land Acquisition and Development Pipeline

The SRHA is identifying underutilized parcels for the development of affordable and elderly-designated housing. Target sites will emphasize proximity to services, transportation, and walkable infrastructure to support aging in place and resident independence.

#### 4. Enhanced Services for Elderly and Disabled Residents

Using MTW flexibilities, the SRHA will expand service coordination for elderly and disabled residents, including mobile wellness visits, transportation partnerships, nutrition programs, and access to in-home care resources.

## **Long-Term Goals (2026–2031)**

### **1. Expand and Preserve Affordable Housing Stock (Including Elderly Units)**

The SRHA will grow its affordable housing portfolio through new construction, acquisition, and redevelopment, with special emphasis on elderly and supportive housing. A senior-focused project is expected to be completed within the five-year horizon.

### **2. Elderly Housing Preservation and Accessibility Enhancements**

The SRHA will assess and begin upgrades to RAD-converted elderly housing units (e.g., Elizabeth Miller Gardens), focusing on energy efficiency, ADA compliance, elevator modernization, and safety improvements. An updated capital needs assessment will guide long-term planning and investment.

### **3. Develop a Model Elderly Housing Community**

The SRHA aims to create a modern elderly-designated housing site featuring universal design, health and wellness space, onsite services, and enhanced accessibility. Development will be supported by MTW capital investments, PBVs, and partner funding.

### **4. Launch a Local Shallow Subsidy Program for Seniors**

Using MTW funds, the SRHA will develop a local shallow subsidy model that provides modest assistance to fixed-income seniors who are rent-burdened but do not qualify for traditional voucher programs. The program will support aging in place and housing stability.

### **5. Expand Self-Sufficiency and Rent Reform Strategies**

Over the next five years, the SRHA will expand:

- Stepped and tiered rent pilot programs to encourage earned income growth.
- Incentive savings programs modeled after FSS but with broader eligibility and design flexibility.
- Time-limited housing assistance with supportive services for working-age families.
- Workforce development incentives and case management support to support work programs.

### **6. Streamlined Operations and Simplified Recertification Policies**

To reduce administrative costs and improve participant experience, the SRHA will implement:

- Digital documentation processes and remote interviews for ease of access.
- Simplified rent calculation methods to ensure clarity and consistency.

## C. MTW Waivers and Associated Activities

### ACTIVITY 1 3.b. Alternative Recertification Schedule For Households (HCV)

#### CORE QUESTIONS

**1. Fiscal Year Introduced**  
2025

**2. Fiscal Year Approved**  
2025

**3. Status**  
Not implemented

**4. Narrative**  
The SRHA will decrease the frequency of tenant reexaminations from annual to triennial for all HCV households. This restructuring will allow families to have a more consistent rent portion over a longer period of time, and it will create more time for the SRHA staff to attend to other business affairs.

Interim recertifications will be limited to one interim per year at the request of the household. If the interim is for a decrease in income, only income decreases of 10% or more will be processed. Interim decreases will be limited to one during a calendar year and no interim decreases during the first six months after initial occupancy. Required interim recertifications for Family Self-Sufficiency, household composition changes, and landlord rent increases will not count against the limit on voluntary interim recertifications.

**5. MTW Statutory Objectives**  
Cost effectiveness

**6. Cost implications**  
Decreased expenditures

**7. Policy by household status/family types/sites**  
The MTW activity applies to all assisted households

**8. Household Status**  
New admissions and currently assisted households

**9. Family Types**  
The MTW activity applies to all family types

**10. Location**  
**For HCV Activities:** The MTW activity applies to all tenant-based units  
The MTW activity applies to all properties with project-based vouchers

**11. Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**  
No

**12. Does this MTW activity require a hardship policy?**  
Yes

**13. Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**

Yes

1. Minimum Rent
2. Alternative Recertification Schedule For Households
3. Work Requirement

**14. Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**

N/A

**15. How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?**

N/A

**16. Does the MTW activity require an impact analysis?**

Yes

**17. Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**

No

**18. Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

This activity was recently approved by HUD and has yet to be implemented.

**19. Please provide an explanation as to why the activity was discontinued or will be discontinued.**

N/A

## CUSTOM QUESTIONS

**1. What is the recertification schedule?**

Once every three years for able-bodied, elderly, and disabled households.

**2. How many interim recertifications per year may a household request?**

1

**3. Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.**

Required interim recertifications for household composition changes or landlord rent increases will not count against the limit on voluntary interim recertifications.

## IMPACT ANALYSIS

- 1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)**  
The SRHA will decrease the frequency of tenant reexaminations from annual to triennial for all of its HCV households. The SRHA predicts that this activity will produce operational cost savings, as staff are freed to manage other administrative affairs.
- 2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)**  
This activity will allow the SRHA's households to have a more consistent tenant rent portion over a longer period of time, which will consequently make the HCV programs more affordable for families.
- 3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)**  
This activity will not affect the waiting list.
- 4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)**  
This activity will not affect the termination rate of families.
- 5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program**  
This activity will not affect the agency's current utilization rate in the HCV program.
- 6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice**  
*MTW Statutory Objective - Cost Effectiveness*  
This activity will decrease the administrative costs associated with processing annual and interim recertifications.
- 7. Impact on the agency's ability to meet the MTW statutory requirements**  
The SRHA will be able to meet the statutory objective of Cost Effectiveness.
- 8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity**  
The SRHA does not expect to see an increase in hardship requests as a result of this activity.
- 9. Across the other factors above, the impact on protected classes (and any associated disparate impact)**  
This activity is based on income reviews, in which protected class is not a factor, and there is no anticipated impact on protected classes.

## ACTIVITY 2 3.d. Self-Certification of Assets (HCV)

### CORE QUESTIONS

1. **Fiscal Year Introduced**  
2025
2. **Fiscal Year Approved**  
2025
3. **Status**  
Not implemented
4. **Narrative**  
The asset self-certification ceiling will be increased from \$5,000 to \$50,000 at recertification. This will lessen the regulatory responsibilities of the SRHA.
5. **MTW Statutory Objectives**  
Cost effectiveness
6. **Cost Implications**  
Decreased expenditures
7. **Policy by Household Status/Family Types/Sites**  
The MTW activity applies to all assisted households
8. **Household Status**  
New admissions and currently assisted households
9. **Family Types**  
The MTW activity applies to all family types
10. **Location**  
**For HCV Activities:** The MTW activity applies to all tenant-based units  
The MTW activity applies to all properties with project-based vouchers
11. **Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**  
No
12. **Does this MTW activity require a hardship policy?**  
No
13. **Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
No
14. **Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**  
N/A
15. **How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?**  
N/A



**16. Does the MTW activity require an impact analysis?**

No

**17. Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**

No

**18. Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

This activity was recently approved by HUD and has yet to be implemented.

**19. Please provide an explanation as to why the activity was discontinued or will be discontinued.**

N/A

## CUSTOM QUESTIONS

**1. Please state the dollar threshold for the self-certification of assets.**

\$50,000

## ACTIVITY 3 1.f. Minimum Rent (HCV)

### CORE QUESTIONS

1. **Fiscal Year Introduced**  
2026
2. **Fiscal Year Approved**  
Pending
3. **Status**  
Not implemented
4. **Narrative**  
To incentivize families to maintain employment, become accustomed to paying rent that is akin to what non-subsidized families pay, decrease program expenses, and increase self-sufficiency, the SRHA will implement a \$130 minimum rent for abled-bodied families.
5. **MTW Statutory Objectives**  
Cost effectiveness  
Self-sufficiency
6. **Cost Implications**  
Increased revenue  
Decreased expenditures
7. **Policy by Household Status/Family Types/Sites**  
The MTW activity applies only to a subset or subsets of assisted households
8. **Household Status**  
New admissions and currently assisted households
9. **Family Types**  
The MTW activity applies only to selected family types: Non-elderly, non-disabled families
10. **Location**  
**For HCV Activities:**   The MTW activity applies to all tenant-based units  
                                  The MTW activity applies to all properties with project-based vouchers
11. **Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**  
No
12. **Does this MTW activity require a hardship policy?**  
Yes
13. **Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
Yes
  1. Minimum Rent
  2. Alternative Recertification Schedule For Households
  3. Work Requirement
14. **Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**  
No

15. **How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?**  
N/A
16. **Does the MTW activity require an impact analysis?**  
Yes
17. **Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
No
18. **Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**  
N/A
19. **Please provide an explanation as to why the activity was discontinued or will be discontinued.**  
N/A

## CUSTOM QUESTIONS

1. **How much is the minimum rent or minimum Total Tenant Payment (TTP)?**  
\$130 minimum rent

## IMPACT ANALYSIS

The impact analysis of this activity is current and valid for this fiscal year.

**1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)**

There are 26 able-bodied families in the HCV program that will be affected by the \$130 minimum rent activity. These families have a rental portion that is less than \$130. It is anticipated that the increase in the minimum rent portion will provide the SRHA a cost savings in the form of decreased HAP by \$1,721 monthly for a total annual savings of \$20,652.

**2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)**

The activity will raise the rental portion for the affected 26 able-bodied families by an average of \$69 per month.

**3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)**

This waiver will not affect the waiting list.

**4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)**

This waiver will not affect the termination rate of families.

**5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program**

This waiver will not affect the agency's current utilization rate in the HCV program

**6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice**

*MTW Statutory Objective - Cost Effectiveness*

This waiver will increase the cost effectiveness of the HVC program. The amount of HAP paid under the HCV program will decrease, and these funds will be available to fund self-sufficiency activities and expand affordable housing choices.

*MTW Statutory Objective – Self Sufficiency*

This waiver will provide incentives for families to work, decrease the incentive to voluntarily make decisions that would reduce household income, and reduce client dependence on the subsidy safety net.

**7. Impact on the agency's ability to meet the MTW statutory requirements**

This waiver will enable the SRHA to meet both the statutory objectives of Cost Effectiveness and Self-Sufficiency.

**8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity**

It is anticipated that the rate of hardship requests will not increase regarding minimum rent waivers.

**9. Across the other factors above, the impact on protected classes (and any associated disparate impact)**

This waiver is implemented based on income reviews in which protected class is not a factor. Therefore, there is no anticipated impact on protected classes.

## ACTIVITY 4 1.n. Utility Reimbursements (HCV)

### CORE QUESTIONS

**1. Fiscal Year Introduced**

2026

**2. Fiscal Year Approved**

Pending

**3. Status**

Not implemented

**4. Narrative**

The SRHA will eliminate the utility reimbursements. The goal is to increase revenue for the authority while making households more self-reliant.

The SRHA disburses \$5,878 in monthly utility reimbursements to approximately 42 HCV households, which equates to an average monthly utility reimbursement of \$140 per household. The yearly average reimbursement is \$1,680 per household. There are approximately 42 households that pay \$0 towards their tenant rent portion due to their utility reimbursement. The SRHA will realize a minimum of \$5,878 in monthly cost savings and at least \$70,536 in yearly cost savings in the form of decreased HAP, during the first year in which this activity is implemented.

**5. MTW Statutory Objectives**

Cost effectiveness

**6. Cost Implications**

Increased revenue

Decreased expenditures

**7. Policy by Household Status/Family Types/Sites**

The MTW activity applies to all assisted households

**8. Household Status**

New admissions and currently assisted households

**9. Family Types**

The MTW activity applies to all family types

**10. Location**

- For HCV Activities:**
1. The MTW activity applies to all tenant-based units
  2. The MTW activity applies to all properties with project-based vouchers

**11. Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**12. Does this MTW activity require a hardship policy?**

No

**13. Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**

No



14. **Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**  
No
15. **How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?**  
N/A
16. **Does the MTW activity require an impact analysis?**  
No
17. **Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
No
18. **Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**  
N/A
19. **Please provide an explanation as to why the activity was discontinued or will be discontinued.**  
N/A

## ACTIVITY 5 2.c. Rent Reasonableness - Process (HCV)

### CORE QUESTIONS

1. **Fiscal Year Introduced**  
2026
2. **Fiscal Year Approved**  
Pending
3. **Status**  
Not implemented
4. **Narrative**  
The SRHA will develop a local process to determine rent reasonableness that differs from the currently mandated program requirements in the 1937 Act and its implementing regulations. Through the Administrative Plan, the SRHA shall make available the method used to determine that rents charged by owners to voucher participants are reasonable when compared to similar unassisted units in the market area.
5. **MTW Statutory Objectives**  
Cost effectiveness
6. **Cost Implications**  
Decreased expenditures
7. **Policy by Household Status/Family Types/Sites**  
The MTW activity applies to all assisted households
8. **Household Status**  
New admissions and currently assisted households
9. **Family Types**  
The MTW activity applies to all family types
10. **Location**  
**For HCV activities:** The MTW activity applies to all properties with tenant -based vouchers
11. **Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**  
No. At the Department's request, the SRHA must obtain the services of a third-party entity to determine rent reasonableness for PHA-owned units.
12. **Does this MTW activity require a hardship policy?**  
No
13. **Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
No
14. **Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**  
No
15. **How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?**  
N/A

**16. Does the MTW activity require an impact analysis?**

No

**17. Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**

No

**18. Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

N/A

**19. Please provide an explanation as to why the activity was discontinued or will be discontinued.**

N/A

## CUSTOM QUESTIONS

**1. Describe the method used to determine rent reasonableness and the motivations for using a method different from the standard method.**

The rent reasonableness process involves utilizing the on-line search engine to identify at least three similar units and documenting the reasonableness of the rent compared to the similar units found. The motivation is cost savings to the agency which can then be used for HAP.

## ACTIVITY 6 2.d. Rent Reasonableness - Third-Party Requirement (HCV)

### CORE QUESTIONS

1. **Fiscal Year Introduced**  
2026
2. **Fiscal Year Approved**  
Pending
3. **Status**  
Not implemented
4. **Narrative**  
The SRHA will remove the requirement to have a third-party perform rent reasonableness determinations on Project Based Voucher units owned, managed, or controlled by the SRHA. The SRHA will establish and make available a quality assurance method to ensure impartiality. The SRHA will make available the method used to determine that rents charged by owners to voucher participants are reasonable when compared to similar unassisted units in the market area.
5. **MTW Statutory Objectives**  
Cost effectiveness
6. **Cost Implications**  
Decreased expenditures
7. **Policy by Household Status/Family Types/Sites**  
The MTW activity applies to all assisted households
8. **Household Status**  
New admissions and currently assisted households
9. **Family Types**  
The MTW activity applies to all family types
10. **Location**  
**For HCV activities:** The MTW activity applies to all properties with project-based vouchers
11. **Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**  
No. At the Department's request, the SRHA must obtain the services of a third-party entity to determine rent reasonableness for PHA-owned units.
12. **Does this MTW activity require a hardship policy?**  
No
13. **Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
No
14. **Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**  
No

15. **How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?**  
N/A
16. **Does the MTW activity require an impact analysis?**  
No
17. **Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
No
18. **Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**  
N/A
19. **Please provide an explanation as to why the activity was discontinued or will be discontinued.**  
N/A

## CUSTOM QUESTIONS

1. **Please explain or upload a description of the quality assurance method.**  
The SRHA will ensure quality by making the new method visible, reviewing the policies used in developing the data, providing documentation, consulting with experts and users (if and when needed), and by keeping users informed about corrections and revisions.
2. **Please explain or upload a description of the rent reasonableness determination method.**  
The rent reasonableness process involves utilizing the on-line search engine to identify at least three similar units and documenting the reasonableness of the rent compared to the similar units found. The motivation is cost savings to the agency which can then be used for HAP.



## ACTIVITY 7 5.a. Pre-Qualifying Unit Inspections (HCV)

### CORE QUESTIONS

1. **Fiscal Year Introduced**  
2026
2. **Fiscal Year Approved**  
Pending
3. **Status**  
Not implemented
4. **Narrative**  
To attract and incentivize qualified landlords to participate in the HCV program, the SRHA will allow vacant units to be pre-inspected prior to occupancy. The pre-inspection will be conducted within 90 days of a participant occupying the unit, HQS inspection standards, as found at 24 CFR 982.401, will not be altered, and all participants will be able to request an interim inspection.
5. **MTW Statutory Objectives**  
Housing Choice
6. **Cost Implications**  
Neutral
7. **Policy by Household Status/Family Types/Sites**  
The MTW activity applies to all assisted households
8. **Household Status**  
New admissions and currently assisted households
9. **Family Types**  
The MTW activity applies to all family types
10. **Location**  
**For HCV Activities:**
  1. The MTW activity applies to all tenant-based units
  2. The MTW activity applies to all properties with project-based vouchers
11. **Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**  
No
12. **Does this MTW activity require a hardship policy?**  
No
13. **Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
No
14. **Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**  
No
15. **How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?**  
N/A

**16. Does the MTW activity require an impact analysis?**

No

**17. Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**

No

**18. Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

N/A

**19. Please provide an explanation as to why the activity was discontinued or will be discontinued.**

N/A

## CUSTOM QUESTIONS

**1. How long is the pre-inspection valid for?**

90 days

## ACTIVITY 8 9.b. Increase PBV Project Cap (HCV)

### CORE QUESTIONS

1. **Fiscal Year Introduced**  
2026
2. **Fiscal Year Approved**  
Pending
3. **Status**  
Not implemented
4. **Narrative**  
The SRHA will increase the cap on the percentage of project-based vouchers that can be project based in a building or project from 25% to 100%. This will allow the SRHA the flexibility to utilize the project-based voucher program to support the repositioning of public housing assets. The SRHA is subject to Notice PIH 2013-27 where applicable, or successor.
5. **MTW Statutory Objectives**  
Cost effectiveness  
Housing choice
6. **Cost Implications**  
Increased revenue
7. **Policy by Household Status/Family Types/Sites**  
The MTW activity applies to all assisted households
8. **Household Status**  
New admissions and currently assisted households
9. **Family Types**  
The MTW activity applies to all family types
10. **Location**  
The MTW activity applies to all properties with project-based vouchers
11. **Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**  
No
12. **Does this MTW activity require a hardship policy?**  
No
13. **Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
N/A
14. **Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**  
No
15. **How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?**  
N/A

**16. Does the MTW activity require an impact analysis?**

No

**17. Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**

N/A

**18. Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

N/A

**19. Please provide an explanation as to why the activity was discontinued or will be discontinued.**

N/A

## ACTIVITY 9 12.b. Work Requirement (HCV)

### CORE QUESTIONS

**1. Fiscal Year Introduced**

2026

**2. Fiscal Year Approved**

Pending

**3. Status**

Not implemented

**4. Narrative**

The SRHA will implement a mandatory work requirement for all non-elderly and non-disabled individuals between the ages of 18 and 62. These individuals must work a minimum of 15 hours per week.

Eligible individuals will meet with the SRHA staff to determine the best course of action, on an individual basis, to meet this activity's ultimate goal of self-sufficiency. The SRHA, at its discretion, will allow acceptable substitutes for employment, such as education or rehabilitation to fulfill this requirement.

The following individuals will be exempt from this activity: elderly and/or disabled individuals, individuals aged 18 years and younger, live-in aides, individuals that are the primary caretaker for a child under 6 years of age, and women who are pregnant.

**5. MTW Statutory Objectives**

Cost effectiveness  
Self-sufficiency

**6. Cost Implications**

Increased revenue  
Decreased expenditures

**7. Policy by Household Status/Family Types/Sites**

The MTW activity applies only to a subset or subsets of assisted households

**8. Household Status**

New admissions and currently assisted households

**9. Family Types**

The MTW activity applies to non-elderly, non-disabled families

**10. Location**

**For HCV Activities:**

1. The MTW activity applies to all tenant-based units
2. The MTW activity applies to all properties with project-based vouchers

**11. Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**12. Does this MTW activity require a hardship policy?**

Yes



13. **Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
Yes  
1. Alternative Recertification Schedule  
2. Minimum Rent  
3. Work Requirement
14. **Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**  
No
15. **How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?**  
N/A
16. **Does the MTW activity require an impact analysis?**  
Yes
17. **Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities.**  
No
18. **Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**  
N/A
19. **Please provide an explanation as to why the activity was discontinued or will be discontinued.**  
N/A

## CUSTOM QUESTIONS

1. **Does the work requirement MTW activity exempt any type of household or individual other than those required to be excluded through the MTW Operations Notice or those excluded as a reasonable accommodation?**  
No
2. **What counts as "work" under this the work requirement MTW activity?**  
Part-time, full-time, and seasonal employment
3. **How will the MTW agency monitor compliance with the work requirement MTW activity?**  
Compliance will be monitored by the SRHA through yearly prescheduled reviews and triennial recertifications. Compliance will also be monitored through the participants themselves, as they must report any non-compliance to the work requirement to the SRHA within 10 days.
4. **What supportive services are offered to support households to comply with the work requirement?**  
Supportive services will be offered through the SRHA staff and/or community partners of the SRHA including the resources below:
1. Blue Ridge Community College – Workforce Development  
<https://www.brcc.edu/workforce-development/financial-assistance/fastforward/>
  2. Atlantic Union Bank – Financial Literacy Program (Bank staff will do classes)  
<https://stauntonrha.banzai.org/wellness>
  3. Augusta Health – Neighborhood Clinic  
<https://www.augustahealth.com/service/neighborhood-clinic/>

4. Project GROWS – Food and Nutrition  
<https://www.stauntonrha.org/ws/media-library/826ca17a6a15bbccf02ec96e8bee4781/2025-mobile-market-schedule.pdf> & <https://www.projectgrows.org/>
5. Education for children  
<https://go2grow.org/>
6. Network2Work  
<https://www.n2work.org/>

**5. How does the agency address noncompliance with the work requirement policy?**

Residents and participants will have 10 days to report non-compliance. If the lack of compliance is not due to a hardship, the SRHA will issue a written warning and the resident must gain employment within six months. The SRHA will also refer the resident or participant to one of SRHA's community partners for services, of which the resident or participant must attend. The resident or participant must check in monthly with the SRHA regarding the progress of his/her job search. If in good faith the resident or participant has not obtained employment in six months, the SRHA will extend the job search for another 60 days. If the or participant has not obtained employment in six months, has failed to check-in with the SRHA, and has failed to participate in the employment services offered, the SRHA will terminate the resident or participant's participation in the public housing or HCV program.

If the resident or participant fails to give notice within 10 days, the resident or participant will receive a "curable" deficiency notice from the SRHA stating the resident or participant's non-compliance. Additionally, the letter will state the requirements for the resident or participant, which includes finding employment within 90 days, checking in monthly with the SRHA, and partaking in services with the SRHA's community partner. If in good faith the resident or participant has not obtained employment in three months, the SRHA will extend the job search for another 30 days. If the resident or participant has not obtained employment in three months, has failed to check-in with the SRHA, and has failed to participate in the employment services offered, the SRHA will terminate the resident or participant's participation in the public housing or HCV program.

If the resident or participant fails to give notice within 10 days, the resident or participant will receive a "curable" deficiency notice from the SRHA stating the resident or participant's non-compliance. If the resident or participant completely disregards the "curable" deficiency notice, the SRHA will terminate the resident or participant's participation in the public housing or HCV program.

**6. How many households are currently subject to the policy?**

99 households

**7. How many households in the most recently completed PHA fiscal year were sanctioned for non-compliance with the work requirement?**

N/A

## IMPACT ANALYSIS

**1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)**

The SRHA will implement a work requirement for individuals aged 18 years and older. The tenant portion of rent may increase because of this activity. If so, the increased tenant portion of rent will decrease HAP for the SRHA.

**2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)**

This activity will provide a neutral effect on the affordability for SRHA families. The possible increase in income received from families may affect their tenant portion of rent at recertification. The decrease in HAP will be utilized to expand housing choices via local, non-traditional housing. Mandatory employment and other SRHA supportive services will prepare families for program graduation.

**3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)**

This activity will not affect the waiting list.

**4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)**

This activity will not affect the termination rate of families.

**5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program**

This activity will not affect the agency's current utilization rate in the HCV program.

**6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice**

*MTW Statutory Objective - Cost Effectiveness*

This activity will increase the tenant portion of rent for families and decrease the HAP given to landlords by the SRHA in the HCV program.

*MTW Statutory Objective – Self Sufficiency*

This activity will obligate able-bodied individuals to work; thereby, allowing them to accumulate funds in preparation of program graduation.

**7. Impact on the agency's ability to meet the MTW statutory requirements**

The SRHA will be able to meet the statutory objectives of Cost Effectiveness and Self-Sufficiency.

**8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity**

The SRHA does not anticipate the number of hardship requests increasing due to the implementation of this waiver. The SRHA has an all-encompassing program of supportive services to mitigate such hardships should they arise.

**9. Across the other factors above, the impact on protected classes (and any associated disparate impact)**

This activity is based on able-bodied individuals, in which protected class is not a factor, and there is no anticipated impact on protected classes.

## **D. Safe Harbor Waivers**

### **D.1 Safe Harbor Waivers seeking HUD Approval:**

The MTW Operations Notice describes a simplified process for MTW agencies to implement MTW activities outside of the safe harbors described in Appendix I. For each Safe Harbor Waiver request, a document that includes the following information must be provided: (a) the name and number of the MTW Waiver and associated activity for which the MTW agency is seeking to expand the safe harbor, (b) the specific safe harbor and its implementing regulation, (c) the proposed MTW activity the MTW agency wishes to implement via this Safe Harbor Waiver, (d) a description of the local issue and why such an expansion is needed to implement the MTW activity, (e) an impact analysis, (f) a description of the hardship policy for the MTW activity, if applicable, and (g) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.

Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?

**X No**

## **E. Agency-Specific Waivers**

### **E.1 Agency-Specific Waivers for HUD Approval:**

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, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.

In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.

For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.

Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?

**X No**

### **E.2 Agency-Specific Waiver(s) for which HUD Approval has been Received:**

For each previously approved Agency-Specific Waiver(s), a set of questions will populate. Does the MTW agency have any approved Agency-Specific Waivers?

**X No**

## F. Public Housing Operating Subsidy Grant Reporting

**F.1** Please provide the public housing Operating Subsidy grant information in the table below for Operating Subsidy grants appropriated in each Federal Fiscal Year the PHA is designated an MTW PHA.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline

## G. MTW Statutory Requirements

### G.1 75% Very Low Income – Local, Non-Traditional

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.

Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income	0
49%-30% Area Median Income	0
Below 30% Area Median Income	0
<b>Total Local, Non-Traditional Households</b>	<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.

### G.2 Establishing Reasonable Rent Policy

**Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?**

Yes. The SRHA will establish a \$130 minimum rent policy for all able-bodied households and eliminate utility reimbursement payments for all households.

### G.3 Substantially the Same (STS) – Local, Non-Traditional

**Please provide the total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.**

0 unit months

**Please provide the total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.**

0 unit months

**How many units, developed under the local, non-traditional housing development activity, were available for occupancy during the prior full calendar year (by bedroom size)?**

Please include only those units that serve households at or below 80% of AMI in the table provided.



PROPERTY NAME/ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	# 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?
<b>Totals</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>		<b>0</b>	<b>0</b>		

\* User will select one of the following from the “Population Type” dropdown box: General, Elderly, Disabled, Elderly/Disabled, Other

If the “Population Type” of is Other is selected, please state the Property Name/Address and describe the population type.  
[Text box]

\*\* The federal accessibility standard under HUD’s Section 504 regulation is the Uniform Federal Accessibility Standards (UFAS) for purposes of Section 504 compliance. HUD recipients may alternatively use the 2010 ADA Standards for Accessible Design under Title II of the ADA, except for certain specific identified provisions, as detailed in HUD’s Notice on “Instructions for use of alternative accessibility standard,” published in the Federal Register on May 23, 2014 (“Deeming Notice”) for purposes of Section 504 compliance, <https://www.govinfo.gov/content/pkg/FR-2014-05-23/pdf/2014-11844.pdf>. This would also include adaptable units as defined by HUD’s Section 504 regulation (See 24 CFR § 8.3 and § 8.22).

#### G.4 Comparable Mix (by Family Size) – Local, Non-Traditional

In order to demonstrate that the MTW statutory requirement of “maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration” is being achieved, the MTW agency will provide information for its most recently completed Fiscal Year in the following table. Local, non-traditional family size data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

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

## G.5 Housing Quality Standards

Certification is included in MTW Certifications of Compliance for HCV and local, non-traditional program. The public housing program is monitored through physical inspections performed by the Real Estate Assessment Center (REAC).

## H. Public Comments

**H.1 Please provide copy of all comments received by the public, Resident Advisory Board, and tenant associations.**

Attached

**Please attach a narrative describing the MTW agency's analysis of the comments and any decisions made based on these comments.**

Attached

If applicable, was an additional public hearing held for an Agency-Specific Waiver and/or Safe Harbor waiver?

☐ Yes

☐ No

☒ N/A

**If yes, please attach the comments received along with the MTW agency's description of how comments were considered.**

## I. Evaluations

**I.1 Please list any ongoing and completed evaluations of the MTW agency's MTW policies, that the PHA is aware of, including the information requested in the table below. In the box "title and short description," please write the title of the evaluation and a brief description of the focus of the evaluation.**

**Does the PHA have an agency-sponsored evaluation?**

No

**Table I.1 – Evaluation of MTW Policies**

Title and short description	Evaluator name and contact information	Time period	Reports available

## J. MTW Certifications of Compliance

**J.1 The MTW agency must execute the MTW Certifications of Compliance form and submit as part of the MTW Supplement submission to HUD. Certification is provided below.**









## APPENDICES

Activity Organizer								
Activity #	MTW Waiver	Core Questions	Custom Questions	Safe Harbor	Impact Analysis	Hardship Policy	FY Intro	FY Approved
1. Tenant Rent Policies								
3	f. Minimum Rent (HCV)	X	X	X	X	X	2026	Pending
4	n. Utility Reimbursements (HCV)	X					2026	Pending
2. Payment Standards and Rent Reasonableness								
5	c. Rent Reasonableness – Process (HCV)	X	X				2026	Pending
6	d. Rent Reasonableness – Third-Party Requirement (HCV)	X	X				2026	Pending
3. Reexaminations								
1	b. Alternative Reexamination Schedule for Households (HCV)	X	X	X	X	X	2025	2025
2	d. Self-Certification of Assets (HCV)	X	X	X			2025	2025
5. Housing Quality Standards (HQS)								
7	a. Pre-Qualifying Unit Inspections (HCV)	X	X	X			2026	Pending
9. Project-Based Voucher Program Flexibilities								
8	b. Increase PBV Project Cap (HCV)	X		X			2026	Pending
12. Work Requirement								
9	b. Work Requirement (HCV)	X	X	X	X	X	2026	Pending



## Hardship Policy

The SRHA has established a hardship policy to evaluate individual circumstances to address hardship exemption requests.

### Applicable Family Situations

Qualifying hardships include the following:

1. The family has experienced a decrease in income because of changed circumstances including,
  - a. Involuntary loss or reduction of employment
  - b. Death in the family
  - c. Involuntary reduction in or loss of earnings or other assistance
2. The family has experienced an increase in expenses because of changed circumstances, for
  - a. Medical costs that exceed 25% or more of the family's current expense
  - b. Childcare costs that exceed 25% or more of the family's current expense
  - c. Involuntary loss of transportation, such as a serious car accident
  - d. Education
  - e. Similar items
  - f. Such other situations and factors determined by the SRHA to be appropriate.

### Process for Agency Review and Determination

When a client requests a hardship exemption from an MTW activity, the SRHA will take the following actions:

1. Suspend the MTW activity beginning the next month after the request until the agency has determined if the request is warranted.
2. Determine whether a hardship exists within a reasonable time after the family request and whether it is temporary or long term.
3. The SRHA will not evict the family during the 90-day period beginning the month following the family's request for a hardship exemption.
4. If it is determined that a financial or other hardship exists and is **TEMPORARY**, the SRHA will continue providing an exemption from the MTW activity at a reasonable level for up to 90 days. After that time, the SRHA will reinstate the MTW activity from the beginning of the suspension. The SRHA will offer the family a reasonable repayment agreement, on terms and conditions established by the SRHA for the amount of back rent owed by the family.
5. If it is determined that a financial or other hardship exists and is **LONG-TERM**, the SRHA will continue providing an exemption from the MTW activity at a reasonable level for a specified duration determined by the SRHA. After that time, the SRHA will reinstate the MTW activity from the beginning of the suspension. The SRHA will offer the family a reasonable repayment agreement on terms and conditions established by the SRHA for the amount of back rent owed by the family.
6. If it is determined that a financial or other hardship request did not meet hardship standards, the client must resume the MTW activity and collect any retroactive rent, if applicable, through a reasonable repayment agreement.

### Resident and Participant Notification

The SRHA will notify families of its Hardship Policy through its Administrative Plan, Admissions and Continued Occupancy Policy (ACOP), at intake, at recertification, and when a family is to be terminated due to an MTW activity.

### Grievance Procedure

If a family's hardship request is denied, the family is permitted to go before the Hearing Officer for a second review.

### Reasonable Accommodations

The SRHA will address persons with handicaps requesting a reasonable accommodation under 24 CFR part 8 through the SRHA's Reasonable Accommodations Policy and procedures.

### Record Keeping

The SRHA will keep clear records for hardship requests and determinations for three (3) years. These records are available for public review and inspection at the SRHA's principal office during normal business hours and supplied to HUD if requested.