



STAUNTON
Redevelopment
& Housing Authority

FY25

MOVING TO WORK SUPPLEMENT

STAUNTON REDEVELOPMENT & HOUSING AUTHORITY

Submitted January 2025

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A. PHA Information

A.1	PHA Name	Staunton Redevelopment & Housing Authority
	PHA Code	VA023
	MTW Supplement for PHA Fiscal Year Beginning	01/01/2025
	PHA Program Type	HCV
	MTW Cohort Number	5
	MTW Supplement Submission Type	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.

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**
Pending

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 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

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.**
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?**
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. **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**
Pending
3. **Status**
Not implemented
4. **Narrative**
The asset self-certification ceiling will be increased from \$5,000 to \$50,000. 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
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.
N/A
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

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?

☒ 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?

☒ 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?

☒ 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
2025	\$0	\$0	\$0	09/30/2033

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
Total Local, Non-Traditional Households	0

*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?
No.

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?
Totals	0	0	0	0	0	0	0		0	0		

* 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
Totals	0

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
3. Reexaminations								
1	b. Alternative Reexamination Schedule for Households (HCV)	X	X	X	X	X	2025	Pending
2	d. Self-Certification of Assets (HCV)	X	X	X			2025	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.