



HUD Moving to Work Expansion Training

Landlord Incentives Cohort Onboarding - The MTW Supplement to the PHA Plan and the Public Process

April 13, 2022

Today's Agenda – MTW Supplement: The MTW Supplement to the PHA Plan and the Public Process

- 1 What is the MTW Supplement?
- 2 MTW Waivers
- 3 Impact Analysis and Hardship Policies
- 4 Public Engagement
- 5 Questions

What is the MTW Supplement?



Collects information about policies implemented by MTW Expansion agencies



Used by agencies to communicate MTW plans with residents and community stakeholders



Used by HUD to monitor and evaluate the MTW demonstration program



Even qualified agencies must submit annually



Submit with PHA Plan or as amendment to previous PHA plan

- Submit PHA plan first

Sections of the MTW Supplement

- A. PHA Information
- B. Narrative
- C. MTW Waiver and Associated MTW Activities
- D. Safe Harbor Waivers
- E. Agency-Specific Waivers
- F. Public Housing Operating Subsidy Grant Reporting
- G. MTW Statutory Requirements
- H. Public Comments
- I. Evaluations
- J. MTW Certificate of Compliance



Mastering the MTW Supplement

- **Now:** Understand what the MTW Supplement is and what it will require
- **Later:** Review the MTW Supplement resources in detail when you are ready to complete the form

[MTW Supplement Information at HUD.gov](https://www.hud.gov/mtw-supplement)



Types of Waivers

MTW Waivers	17 MTW Waivers are included in the MTW Operations Notice, permitting 70 associated activities
Safe Harbor Waivers	Allows agency to request permission from HUD to expand an activity outside the listed safe harbors; safe harbors marked with an asterisk (*) cannot be waived
Cohort-Specific Waivers	Unique to an MTW Expansion cohort to study a specific policy area
Agency-Specific Waivers	Allows agency to request that HUD waive requirements of the 1937 Act not included in the MTW Operations Notice

**See [Section 4 of the MTW Operations Notice](#) or [Types of Waivers and Their Requirements](#) section of the Online Manual*



MTW Waiver Descriptions

Waiver Name/ Description	The waiver description defines the authorization provided to the MTW agency, subject to the terms of this notice.
Statutes and Regulations Waived	The statutory and regulatory citations that may be waived by an MTW agency in order to implement an activity are included below the activity.
Permissible Activities	The list of waivers and list of activities are organized by program type.
Safe Harbors	The safe harbors contain the additional requirements (beyond those specified in the activity description) the agency must follow in order to implement the activity without additional HUD approval once it is included in an approved MTW Supplement to the PHA Plan.



MTW Waivers – Safe Harbors

1.e.,1.f. Minimum Rent		
Activity	1.e. <u>Minimum Rent (PH)</u> - The agency may set a minimum rent that is higher than allowed under current statute and regulation.	1.f. <u>Minimum Rent (HCV)</u> - The agency may set a minimum rent that is higher than allowed under current statute and regulation.
Statutes and Regulations Waived	<u>Minimum Rent (PH)</u> - Certain provisions of sections 3(a)(1)-(2) and 3(a)(3)(A) of the Act and 24 CFR 5.628 and 5.630.	<u>Minimum Rent (HCV)</u> - Certain provisions of sections 3(a)(3)(A) and 8(o)(2)(A)-(C) of the Act and 24 CFR 5.628 and 5.630.
Safe Harbor(s)	1.e. and 1.f. <ul style="list-style-type: none"> i. Minimum rent must not exceed \$130 per month. ii. Agency must exclude elderly and disabled families from rent policy. iii. Agency must conduct an impact analysis. * iv. Agency must implement a hardship policy. * 	

MTW Waivers

MTW agencies may implement any activity contained in Appendix I of the MTW Operations Notice without further HUD approval AFTER:

- It is included in an MTW Supplement to a PHA Plan that has been approved by the Field Office
- The MTW agency has updated the ACOP and/or Administrative Plan.
- The MTW agency has ensured that the activity will be implemented within the associated safe harbors (or has received approval for a Safe Harbor Waiver).



Landlord Incentive Cohort-Specific Waivers

Restrictions on Waivers/Activities for 4 years	<p>Waiver 1: Tenant Rent Policies, Activities d, f, l, o, q and s</p> <p>Waiver 5: Housing Quality Standards, Activity b</p> <p>Waiver 7: Term-Limited Assistance, Activity b</p> <p>Any Agency-Specific or Safe Harbor Waivers that undermine evaluation</p>
Landlord Incentives Cohort MTW Activities List <i>(must choose at least 2)</i>	<p>2.a. Payment Standards – Small Area Fair Market Rents (SAFMR)</p> <p>2.b. Payment Standards – Fair Market Rents (FMR)</p> <p>4.a. Vacancy Loss</p> <p>4.b. Damage Claims</p> <p>4.c. Other Landlord Incentives</p> <p>5.a. Pre-Qualifying Unit Inspections</p> <p>5.d. Alternative Inspection Schedule</p> <p><i>Cohort-Specific 4.1: Waiver of Mandatory Initial Inspection (HCV)</i></p> <p><i>Cohort-Specific 4.2: Front end vacancy loss payment</i></p>



Questions?



Impact Analysis - Key Things to Know

- 1 Intended to help assess how effective activity is (or will be) and to help identify any unintended consequences or hardships likely to affect assisted households
- 2 Not required annually for every activity, but is required annually for some activities
- 3 A single impact analysis may be conducted for combined set of MTW activities that jointly form a single comprehensive initiative
- 4 Must be repeated for a larger initiative that undergoes substantial change, such as adding an activity
- 5 When required as a safe harbor (marked with an asterisk*) impact analyses cannot be waived

[Appendix II of the Ops Notice](#)



Impact Analysis – Factors to be Assessed and Considered
















Must be assessed and considered BEFORE implementation

Disparate Impact

- | | |
|---|---|
| 1 Agency's finances | 5 Public housing occupancy/
HCV utilization rate |
| 2 Affordability of housing
costs for affected families | 6 Meeting the MTW
statutory objectives |
| 3 Agency's waitlist(s) | 7 Meeting the MTW
statutory requirements |
| 4 Agency's termination rate
of families | 8 Hardship requests and
number granted/ denied |



When is an Impact Analysis Required?

	Prior to Implementation	Annually During Implementation	At Closeout
MTW Waiver <u>without</u> impact analysis required as a safe harbor			
MTW Waiver <u>with</u> impact analysis required as a safe harbor			
Safe Harbor Waiver			
Agency-Specific Waiver			
Any waiver for which HUD specifically indicates an annual impact analysis is required			

As You Plan for an Impact Analysis...



Who will be assigned to conduct the initial impact analysis?



What methods will you use to deliver assessment results?



What methods or tools will you use to collect data?



How will you respond to the results?



How will you analyze results?



What will you do if you are seeing weak, or even negative, results?



How often will you reassess or repeat?

Impact Analysis – Insights and Resources

Don't do too much at once, take your time, think it out, do the impact analysis and do it once and do it well.

Really figure out who it is exactly you're serving and involve them in the decision. Public Engagement on the front end might change Impact Analysis information, so engage stakeholders early and often!

Think about why you are changing this rule, what do you want to do it, who's it going to impact, how is it going to impact.

[Impact Analysis Requirements can be found in Appendix II of the Ops Notice](#)

[How to Approach an MTW Impact Analysis Interactive Training](#)

[Impact Analysis & Hardship Policies Webinar](#) and [Slides](#)



Questions?



Hardship Policies - Key Things to Know

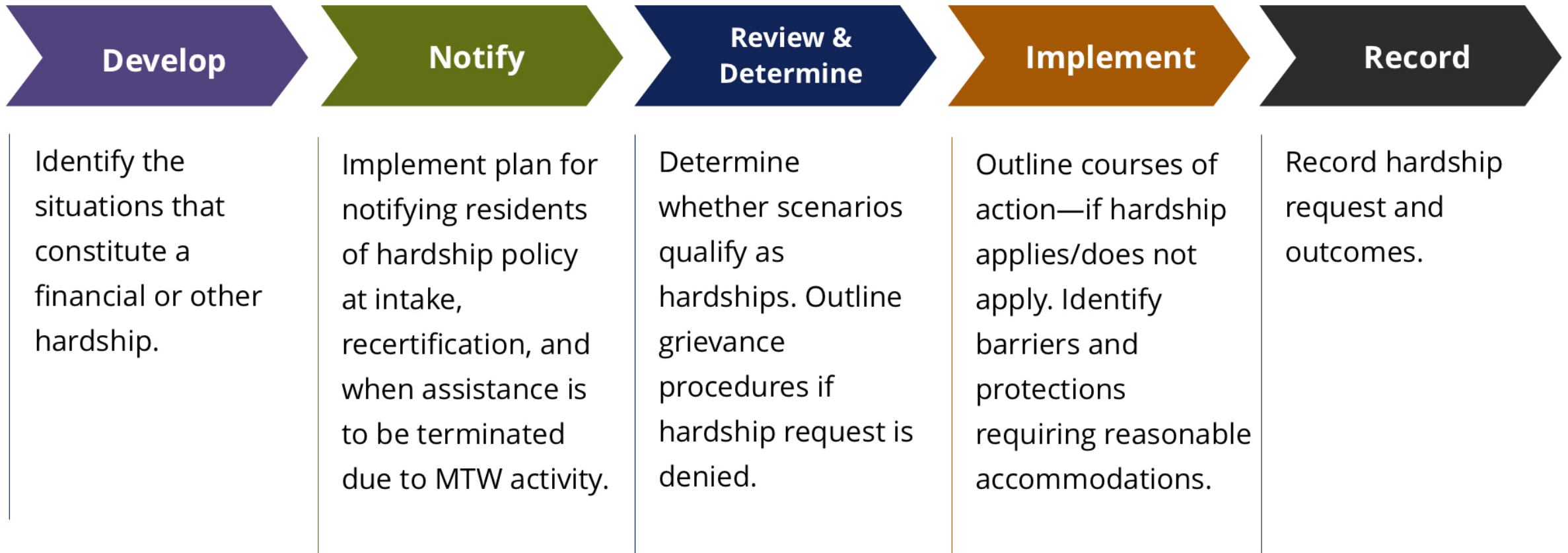
- 1 Each MTW agency must adopt a written hardship policy
- 2 Used to outline how agency will determine when a requirement of an MTW activity constitutes a financial or other hardship
- 3 May use a single hardship policy, or may develop different policies for different MTW waivers
- 4 Review hardship policy(s) with residents during intake and recertification
- 5 If hardship policy is required, it must outline how the agency will immediately provide an exemption from the activity at a reasonable level and duration
- 6 Include grievance procedure for requesting second review of denied hardship requests
- 7 Include as attachment to MTW Supplement to the Annual PHA Plan

[Appendix II of the Operations Notice: Hardship Policy Requirements](#)

[MTW Expansion Training Sample Hardship Policy \(hudexchange.info\)](#)



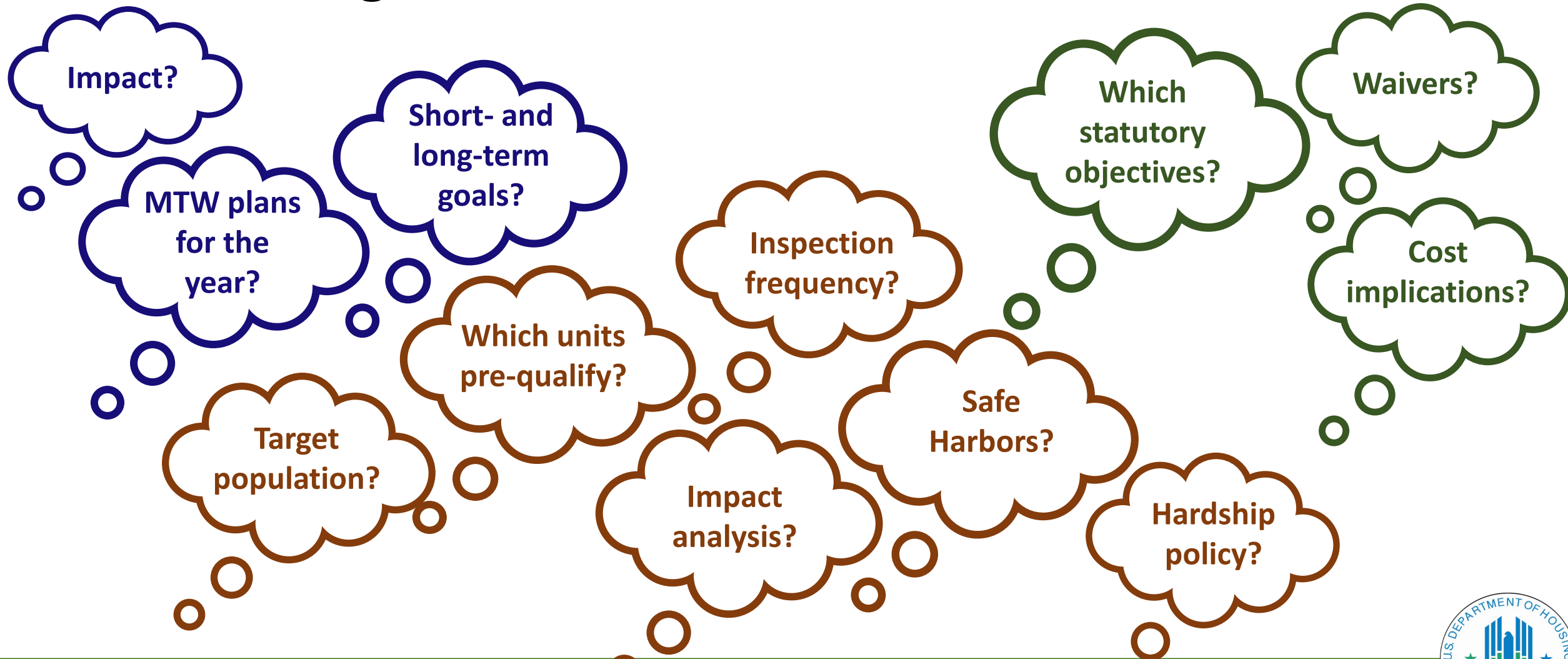
Hardship Policies: Process Overview



Questions?



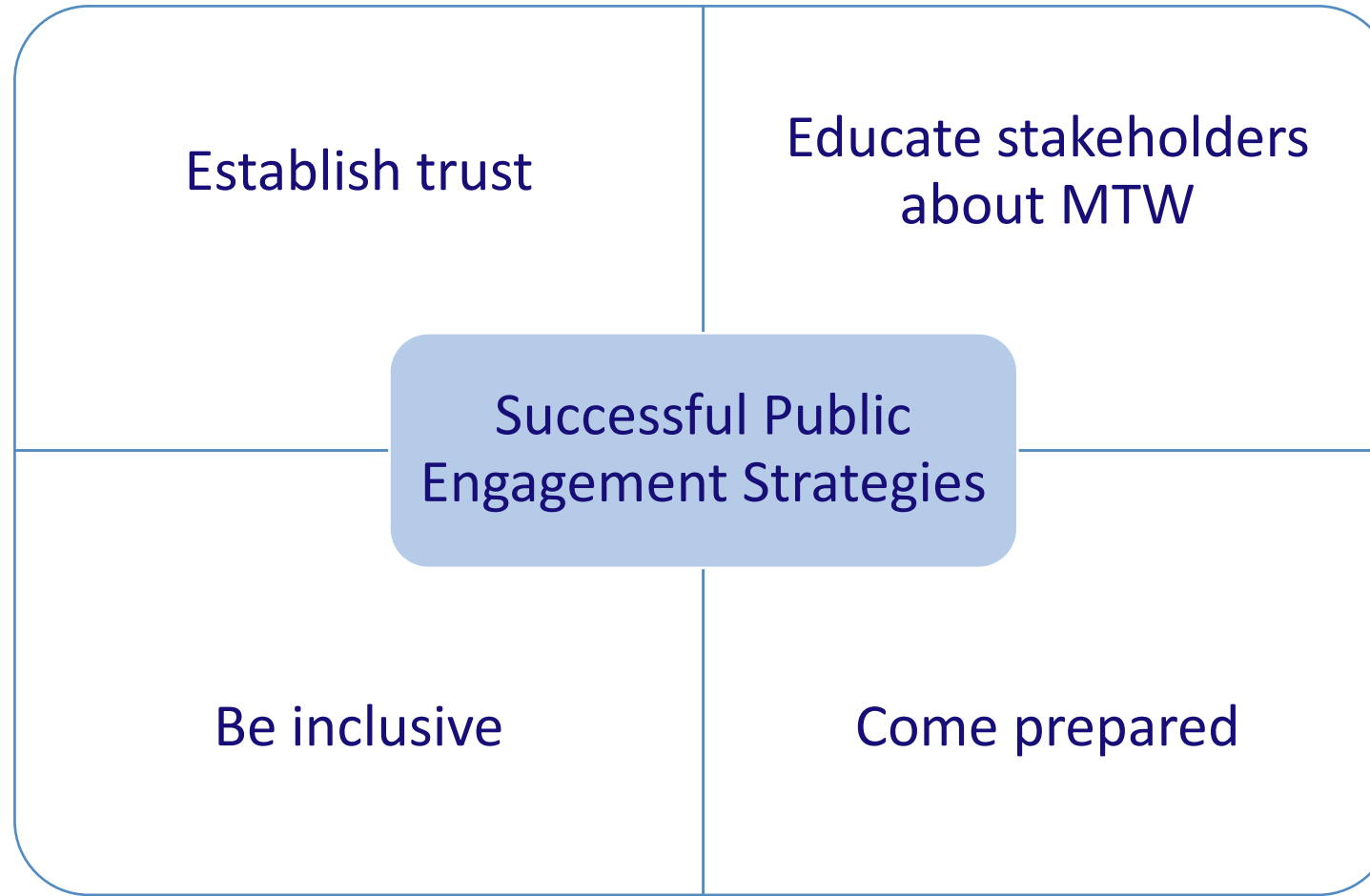
Thinking About What You Need to Get Started



10 Minute Break



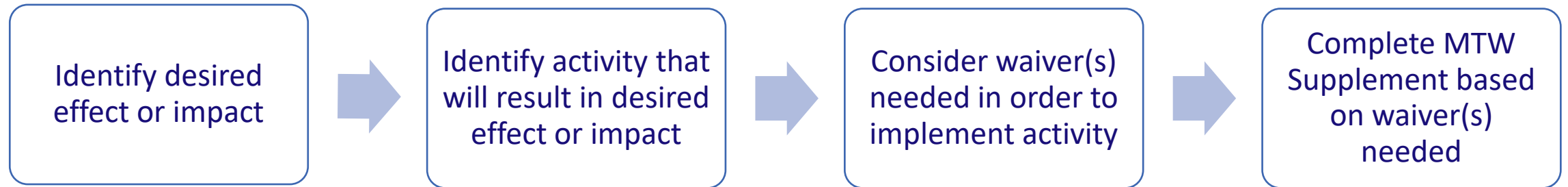
Public Engagement



Questions?



Charting the Course



Additional Questions?



Resources

- [MTW Selection Notice](#)
- [MTW Operations Notice](#)
- [Moving to Work page on HUD.gov](#)
- [Moving to Work Expansion page](#)
- [MTW Expansion Training](#)
- [MTW Expansion Webinars](#)
- [MTW Supplement Webpage](#)
- [MTW Online Manual](#)
- [MTW Expansion Training Sample Hardship Policy \(hudexchange.info\)](#)
- [How to Approach an MTW Impact Analysis Interactive Training](#)
- Welcome Letter, Timeline, and Resources received via email



Upcoming Landlord Incentives Cohort Onboarding Webinars

The MTW Supplement – Tips for Success	May 4, 2022	2:00 – 4:00 PM EDT
HUD-50058 MTW Expansion Form Changes	May 25, 2022	2:00 – 4:00 PM EDT
Office Hours	June 8, 2022	2:00 – 4:00 PM EDT

*Note: MTW Office Hours has been moved from May 25th to June 8th.
The MTW-50058 Expansion Form Changes webinar will be held on May 25, 2022.



Thank you!

