HUD Moving to Work Expansion Training

MTW Flexibility II Cohort Onboarding – The MTW Supplement – How to Submit Your First MTW Supplement July 25, 2024





Muting & Unmuting



- You are muted upon entry.
- You can mute and unmute yourself throughout this webinar.
 - Red = Muted
 - Green = Unmuted/Audible



- Please remain **muted** throughout, unless you would ask a question or provide input.
- To speak, click the Microphone button to unmute; ask your question or provide your comment. Please mute yourself when you are done.

Questions?



 You can ask your question or provide your input verbally by simply unmuting yourself and speaking aloud (remember to re-mute when you're done!)

OR

• Type your question or comment in the Chat box (send to Everyone)

HUD Moving to Work Expansion Training

MTW Flexibility II Cohort Onboarding – The MTW Supplement – How to Submit Your First MTW Supplement July 25, 2024





Today's Agenda



- Welcome
- **Overview of preparations for submitting the MTW Supplement**
 - Requirements, reminders, and process
 - Public engagement •
 - Voice of experience
 - Tips for Success
 - Writing Strong Narratives •
 - Preparing and Submitting
 - Information about required attachments 🥜 •

- MTW Online Form Submission
- Resources

MTW Supplement Reminders



- Submit annually, even when PHA Plan is not required annually
- Submit 75+ days prior to the start of the agency's fiscal year
- Before implementing activities:
 - Wait for HUD approval!

(Approval for Agency-Specific and Safe-Harbor Waivers may come later)

- Finalize updates to the ACOP/Admin Plan before implementing activity
- The <u>MTW Operations Notice</u> is your FIRST resource! Refer to it early and often!
 - <u>Appendix I: Waivers, Associated Activities and Safe Harbor(s)</u>
 - <u>Appendix II: Requirements for Safe Harbors: Impact Analysis/Hardship Policies</u>
 - Section 7(a)(ii): MTW Supplement to the Annual PHA Plan
- MTW Flexibility II Cohort Selection Notice



Public Engagement



- Involve Resident Advisory Boards (RABs) or Tenant Association
- Hold a minimum of two (2) resident/participant meetings
- Make PHA Plan and MTW Supplement available for review simultaneously
- Have draft MTW Supplement and supporting documentation (i.e., Impact Analysis and Hardship Policies) available for public review prior to Public Hearing
- Publish Notice 45 days prior to Public Hearing
- Use the <u>HUD-50075-MTW OMB approved form</u> in your planning
 - Don't try to use the online system as a planning tool
 - Draft narratives in Word and gather all supporting documentation prior to beginning MTW Supplement online

Getting Buy-In





Public Engagement





Keep careful track of all public comments so you can develop a document that includes:

- 1. The comments received by the public, RABs, and tenant associations must be submitted by the MTW agency, along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.
- 2. PHAs must submit comments and responses for all Safe Harbor and Agency-Specific Waivers, which are to be held in an additional public meeting.



Remember: The MTW Public Engagement process requires specific steps and timing. Plan carefully to meet the timelines, and keep excellent records to facilitate the process of developing supporting documents for your MTW Supplement

PHA Plan and MTW Supplement to the PHA Plan – Timeline





Timing of Admin Plan/ACOP



- 1. Use one of the Agency Plans templates
 - <u>https://www.hud.gov/program_offices/public_indian_housing/pha</u>
- 2. Consider any policy updates to incorporate
- 3. Propose changes, using a redline version
- 4. Include language that states the proposed policy changes are pending approval of the MTW Supplement to the PHA Plan
- 5. Provide a copy to your board
- 6. Post a 45-day notice for public comment
- 7. Obtain Board approval and implement pursuant to effective date of approved MTW Supplement to the PHA Plan

Image: MTW Supplement Timing Take-Aways



- MTW Supplement submission process will take approximately 6 months (if all goes smoothly).
- Submission times must be:
 - Concurrent with Annual PHA Plan or
 - As an amendment to existing Annual PHA Plan.

Public Process Case Study: Akron MHA

Lindsay Mellor MTW Coordinator Imellor@akronhousing.org





Akron MHA



www.akronhousing.org

- PHA at a glance
 - 5,430 HCVP vouchers
 - 4,321 Public Housing units
 - 575 HOPE VI/Mixed Finance units
- MTW Status
 - MTW ACC Amendment effective September 2021
 - Part of Cohort 2: Stepped and Tiered Rent Demonstration

Prior to Public Process



• Reach out!

"Who might this impact?" "Who might have thoughts on this?"

- Resident Advisory Board
- Surveys for participants, landlords, and staff
- Staff Committee
- Staff Meetings
- MTW Advisory Committee

Prior to Public Process Continued...



- Timing
 - It's never too early or too late
 - Monthly or quarterly committee meetings
 - Keep records for future waiver requests
- Education, Communication, and Presentation
 - Explain why and the agency's goals
 - Receive feedback
 - Offer information and receive feedback in multiple methods and mediums

During the Public Process



- Notify your participants and other interested parties
- Offer multiple options
- General MTW Supplement hearing can be immediately followed by the agency specific/safe harbor waiver hearing
- Have the right staff available to answer questions
- Create a timeline to keep track of all the dates, including internal items

Key Takeaways



- Ask multiple groups in multiple ways
- Keep the conversation going throughout the year
- Back and forth communication

Questions?



Select Waivers



- Based on goals and desired activities:
 - Select from MTW Waivers when possible:
 - MTW Operations Notice Appendix I
 - Official Version
 - <u>Reader Friendly Version</u>
 - MTW Flexibility II Cohort <u>Selection Notice</u>
 - Search MTW Waivers easily in the MTW Online Training
 - List of All Available MTW Waivers HUD Exchange
 - Take good note of required safe harbors!
 - Request Agency-Specific or Safe Harbor Waivers if needed.
 - <u>Safe Harbor and Agency-Specific Waiver Request Process</u>

Tips for Writing Strong MTW Supplement Narratives



Before	After
Nothing measurable	Includes times, dates, anticipated impacts in measurable form
No connection to MTW Objectives	Explicit statement of MTW Objectives
Activities and waivers not linked to a goal	Activities and waivers framed around achieving a goal
Assertions without substantiation (e.g., "There is no impact")	Assertions backed up with logical analysis explaining "how we know"
No evidence of understanding associated requirements	Include the safe harbor waivers in the narrative description so it is clear to the public what they are



Before

• The triennial reexamination schedule will incentivize families to work, and result in cost savings for AHA.





After

- A triennial reexamination schedule will incentivize families to increase their earned income between reexaminations, as they will get to keep 100% of their additional earnings until their next reexamination. This supports the statutory objective of cost effectiveness.
- Triennial exams are anticipated to **decrease the staff time required to complete annual and interim reexaminations**. This supports the **statutory** objective of reducing costs.

Preparing an Impact Analysis



- Why perform an Impact Analysis?
 - Helps assess how effective an activity is (or will be) and helps identify any unintended consequences or hardships likely to affect assisted households.
- How to Use Results
 - $\circ~$ Revise activities to prevent negative impacts
 - $\circ~$ Add Hardship Policies in case of negative impact
 - Submit as attachment to MTW Supplement!
- Resources
 - MTW Operations Notice
 - How to Approach an MTW Impact Analysis
 - Impact Analysis & Hardship Policies Webinar



Remember: Impact Analysis must be completed BEFORE Public Hearing notice published.





Before

 PHA staff will spend only one-third the amount of time processing reexaminations, which will result in a substantial cost savings. There will not be any impact on households from this administrative change.





After

1. Impact on agency's finances

AHA anticipates a decrease in expenses due to **decreased staff time spent verifying income, assets**, and deductions as part of processing annual reexaminations. However, that decrease will be moderated by the need to process hardship exemptions for some families. AHA estimates a savings of **\$50,000 annually in staff time** due to these activities. AHA expects to see a decrease in per-family contribution due to delayed "triennial" rent increases. AHA estimates a cost of \$20,000 annually due to delayed rent increases.

2. Impact on affordability of housing costs for affected families

AHA anticipates that housing costs will be more affordable until the next triennial reexamination for families whose incomes increase.





After

3. Impact on agency's waitlist(s)

No anticipated impact. Although fewer families may transition from assistance in the time between triennial reviews vs annual reviews, this population tends to be relatively stable in their need for **ongoing assistance** and AHA projects that any impact would be minimal.

4. Impact on agency's termination rate of families

AHA anticipates that households may receive fewer termination notices for noncompliance with required documentation.

Developing Hardship Policies



- Why develop a Hardship Policy?
 - Required safe harbor
 - Impact Analysis identifies potential hardships
- General policy may cover multiple activities, but:
 - Tailor to the hardships identified
 - Do not parrot the Operations Notice
 - You can find a <u>Sample Hardship Policy</u> in the online manual
- Submit as attachment to the MTW Supplement

Remember: Hardship Policies must be completed BEFORE Public Hearing notice is published.





Before

• We will follow our existing policy of allowing families to ask for a hardship rent.





After

 If the family experiences a decrease in income, change of circumstances or increase in expenses that would make it difficult to pay its share of the rent, the family can request a hardship rent. The hardship rent will be provided for up to 12 months and if the hardship persists, the family can request one or more renewals, up until their next triennial reexamination.

Questions?



10 Minute Break



MTW Supplement: Preparing for Submission



C.3 Reexaminations				
3.a., 3.b., - Alternative Reexamination Schedule for Households (PH & HCV)	Input options and instructions			
What is the recertification schedule?	 (Check one) Once every two years Once every three years Other [If checked]: Please describe [Text box] 			
How many interim recertifications per year may a household request?	 0 1 2 or more 			
Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.	[Text box]			

MTW Supplement to the Annual PHA Plan (PDF form)

MTW Supplement: Preparing for Submission



Suggested process

Walk through the sections of the PDF form

Gather input from colleagues as needed

Draft text in Word document so it is ready to paste into the Online MTW Supplement Form

Gather your supporting documentation



Remember: Use HUD-50075-MTW OMB approved form in your planning before beginning to complete the MTW Supplement online!

MTW Supplement Preparing for Submission





Attachments will include:

- Impact Analysis
- Hardship Policies
- Safe Harbor and/or Agency-Specific Waiver requests
- Cohort-Specific Waiver requests
- Public comment file
- Public comment analysis and decisions file
- MTW Certification of Compliance
- Naming convention: PHA Code | Fiscal Year (FY) | Short Name
 - CA789FY23RentHardship (for a rent hardship policy)
 - CA789FY23ImpactAnalysis (for an Impact Analysis)

MTW Supplement: Preparing for Submission



 Instructions for the MTW Supplement are at the end of the HUD-50075-MTW OMB approved form of the MTW Supplement!

 Get hints from the <u>Completing the MTW</u> <u>Supplement - Reference</u> <u>Guide</u>

B. Narrative

B1. The narrative provides the MTW agency with an opportunity to explain to the public, including the families that it serves, its MTW plans for the fiscal year and its short and long-term goals.

The MTW agency should provide a description of how it seeks to further the three MTW statutory objectives during the coming Fiscal Year. Those three MTW statutory objectives are: (1) to reduce cost and achieve greater cost effectiveness in federal expenditures; (2) to give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient; and (3) to increase housing choices for the program families.

- Describe how you seek to address the three statutory objectives.
 Recommended you draft in a Word document and paste here. This text box is plain text, so Word formatting won't transfer over.
- Do the same for all the other types of narrative text boxes.



MTW Supplement – Online Form Tips 🕺 🚺 🛛 🖤



Request access to the form once you are ready to begin planning.

Limit staff that will actively use the system.



PHA Executive Director must be the one to submit access requests after looking at the information in the **Housing** Information Portal (HIP) MTW Supplement Modules for PHA **Users** on the HIP System Training page.

MTW Supplement – Online Form Tips





1		
DHA Name		
Fayetteville Housing Autho	ity	
PHA Code		
AR097		
PHA Program Type		
Combined		
MTW Cohort Number		
2		
MTW Supplement for F	HA Fiscal Year Beginning	
10/1		
Year for Supplement Fi	cal Year Beginning	
Select		
MTW Supplement Sub	ission Type	
Select		

Input the Fiscal Year Beginning date of the Fiscal Year *that you want MTW Supplement Activities to begin* into this field in Section A





- No use of waivers until MTW Supplement is approved.
- HUD will email concerns or corrections.
- PHAs should respond to comments from HUD in a timely manner. Any revisions to the content of the MTW Supplement must be done in the online system.

Submitting Revised MTW Supplement X MTW



- To Submit a Revised MTW Supplement:
 - Follow Field office instructions before updating the MTW Supplement in the online system
 - Read the How to Use the System for instructions to revise or delete a *file,* available on the <u>HIP System Training</u> page.
- Finalize the updated Administrative Plan and ACOP, as applicable, prior to implementing the approved waivers/activities



Remember: The online MTW Supplement form is continuing to evolve. In the future you may need to check the MTW Supplement page on HUD.gov to find updated documents.

Questions?



Resources



MTW System Guidance

- Resources on the <u>HIP System Training page</u>:
 - Information about Getting Started
 - How to Use the System
 - User access request
 - Known issues affecting PHA users
- <u>MTW Supplement Web-based Form System PHA</u>
 <u>Demo</u>

Additional MTW Supplement Resources

- MTW Flexibility II Cohort Selection Notice
- <u>MTW Supplement Page on HUD.gov</u>

Guidance for Completing the MTW Supplement

- <u>Completing the MTW Supplement Reference</u> <u>Guide</u>
- <u>Section 7(a)(ii): MTW Supplement to the</u> <u>Annual PHA Plan</u>
- <u>Appendix I: Waivers, Associated Activities and</u> <u>Safe Harbor(s)</u>
- <u>Appendix II: Requirements for Safe Harbors:</u> <u>Impact Analysis/Hardship Policies</u>
- <u>MTW Supplement to the Annual PHA</u> <u>Plan</u> form HUD-50075-MTW
- MTW Certifications of Compliance
- MTW Supplement FAQs

Resources



Reference and Training

- MTW Flexibility II Cohort Selection Notice
- <u>MTW Operations Notice</u>
- Moving to Work page on HUD.gov
- Moving to Work Expansion page
- <u>MTW Expansion Training</u>
- MTW Expansion Webinars
- <u>MTW Supplement Webpage</u>
- MTW Online Manual

Impact Analysis/Hardship Policies

- <u>How to Approach an MTW Impact Analysis</u> <u>Interactive Training</u>
- <u>MTW Expansion Training Sample Hardship</u> <u>Policy (hudexchange.info)</u>
- Impact Analysis & Hardship Policies Webinar

Activity Selection Resources

- <u>Activity Selection and Implementation Process</u>
 (interactive training)
- <u>Activity Selection: Five Tips for Getting Started (how-to video)</u>

Voices of Experience

- Addressing Challenges when Implementing MTW Waivers
- Working with Partners to Support MTW Activities
- Assessing and Adjusting MTW Activities
- Finding Administrative Efficiencies
- Three Examples of Implementing Waivers
- Involving Residents and the Community (Training):

Upcoming MTW Flexibility II Cohort Onboarding Webinars



Session Name/Topic	Session Date	Session Time
Office Hours	August 22, 2024	2:00 - 4:00 PM ET
TBD	September 19, 2024	2:00 - 4:00 PM ET

Thank you! Email us: MTWFlexibilityII@hud.gov