

PHA Name : Charleston-Kanawha

PHA Code : WV001

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 4/1/2024

PHA Program Type: Combined

MTW Cohort Number: Stepped and Tiered Rent

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

Charleston-Kanawha Housing Authority's (CKHA) MTW application envisioned using MTW flexibility to strengthen provision and support of quality affordable housing desired by individuals and families in the local market area. CKHA intends to be initiative-taking and innovative in strategies and activities to increase cost effectiveness within the organization and increase self-sufficiency and housing choices of residents.

Participation in the MTW Program will allow CKHA to develop local solutions to address housing and self-sufficiency barriers in the community. CKHA intends to simplify administrative burden, create a stronger financial incentive for families to increase their income, continue to provide a safety net for families that cannot readily increase their income, and minimize increases in CKHA's average housing subsidy expenditure per family. In order to achieve success, CKHA will align short and long-term goals with the three MTW statutory objectives of reducing cost and achieving greater cost effectiveness in federal expenditures, giving 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. Proposed changes to policy and program administration, including requests for waivers, that will facilitate MTW activities will be described in successive MTW Supplements to CKHA's Annual Plan. This process includes engaging residents, program participants, stakeholders, staff, community partners and residents.

CKHA's Annual Supplement for the fiscal year beginning April 1, 2023 included waivers focusing on participating in the MTW Demonstration Study related to Rent Reform via Tiered Rent. Additionally, to decrease burden on both staff and residents, increasing the limit for self-certification of assets for all residents and voucher participants, using an alternative utility allowance for voucher participants, and waiving the third party requirement for both HQS inspections on PBV units that CKHA owns, manages or controls, and determination of rent reasonableness.

This Supplement for the fiscal year beginning April 1, 2024 will add a waivers allowing CKHA to increase housing choices by increasing PBV rent to owner, establish and implement payment standards based on Fair Market Rents (FMR), Additionally, a waiver will be added to allow elderly households to complete reexaminations triennially rather than annually, significantly decreasing staff and tenant burden. Another waiver is being requested to create an alternative structure for securing local resources to support a Family Self-Sufficiency Program. with MTW flexibilities.

C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).

1. Tenant Rent Policies	
a. Tiered Rent (PH)	Currently Implementing
b. Tiered Rent (HCV)	Currently Implementing
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Was Discontinued in a previous Submission Year
j. Alternative Utility Allowance (HCV)	Currently Implementing
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Currently Implementing
s. Elimination of Deduction(s) (HCV)	Currently Implementing
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Plan to Implement in the Submission Year
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Currently Implementing
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
c. Self-Certification of Assets (PH)	Currently Implementing
d. Self-Certification of Assets (HCV)	Currently Implementing
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Not Currently Implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Not Currently Implemented
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Currently Implementing
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
6. Short-Term Assistance	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	

Increase Elderly Age (PH & HCV)	Not Currently Implemented
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Not Currently Implemented
b. Increase PBV Project Cap (HCV)	Currently Implementing
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Plan to Implement in the Submission Year
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
10. Family Self-Sufficiency Program with MTW Flexibility	
a.PH Waive Operating a Required FSS Program (PH)	Not Currently Implemented
a.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b.PH Alternative Structure for Establishing Program Coordinating Committee (PH)	Plan to Implement in the Submission Year
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Plan to Implement in the Submission Year
c.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.PH Modify or Eliminate the Contract of Participation (PH)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
11. MTW Self-Sufficiency Program	
a.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
12. Work Requirement	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
14. Moving on Policy	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
15. Acquisition without Prior HUD Approval (PH)	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
16. Deconcentration of Poverty in Public Housing Policy (PH)	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
17. Local, Non-Traditional Activities	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented

C. MTW Activities Plan that Charleston-Kanawha Plans to Implement in the Submission Year or Is Currently Implementing

1.a. - Tiered Rent (PH)
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.</p> <p>As part of the cohort-specific Rent Reform study, CKHA is implementing a tiered rent policy for certain households. Qualifying families will be randomly selected to either pay under the current (standard) or the new (tiered) rent policy. Under the tiered rent policy, families will pay rent based on a rent schedule within tiers of \$2,500. The rent paid by the family will be based on 28% of the midpoint of the income tier corresponding to the family income. Income will be calculated based on gross income for the prior 12-month period for existing households and the current income for newly-admitted households.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness; Self-sufficiency</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Decreased revenue; Decreased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>New admissions and currently assisted households</p>
<p>Does the MTW activity apply to all family types or only to selected family types?</p> <p>The MTW activity applies only to selected family types</p>
<p>Please select the family types subject to this MTW activity.</p> <p>Non-elderly, non-disabled families</p>
<p>Does the MTW activity apply to all public housing developments?</p> <p>The MTW activity applies to specific developments</p>
<p>Which developments participate in the MTW activity?</p> <p>WV001000003 Orchard Manor, WV001000007 Hillcrest/Oakhurst, WV001000008 South Park, WV001000027 CRH LP 1, WV001000028 CRH LP 2, WV001000029 Harris (Rand)/Anderson (Dunbar), WV001000031 CRH LP 3, WV001000032 CRH LP 6, WV001000033 CRH LP 5, WV001000036 Starling Drive, WV001000037 729 Central Avenue, WV001000038 731 Central Avenue</p>

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.

CKHA has been working closely with staff from HUD and its research partner, MDRC, to develop the policy and associated procedures and forms to implement the tiered rent study and to train staff. Study enrollment began in March 2023 for households with annual reexamination dates starting in July 2023 and new admissions beginning July 2023. Enrollment will continue for a full year.

N/A for FY24 (elderly households) - not yet approved

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.

The safe harbor waivers requested for the study allow CKHA to implement the study as designed by HUD.

Please describe how the income bands are structured?

Income bands are in increments of \$2,500 in annual income. Rents are set at 1/12 of 28% of the midpoint of the tier (representing monthly income), except that households with incomes below \$2,500 will pay a minimum rent of \$50.

Please upload the tiered rent policy table that shows the income bands.

This document is attached.

What is the income basis for assigning households to income bands?

This activity uses a different definition of income because we are using the following MTW waivers (check all that apply)

1.r. and/or 1.s. "elimination of deductions"

1.b. - Tiered Rent (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

As part of the cohort-specific Rent Reform study, CKHA is implementing a tiered rent policy for certain households. Qualifying families will be randomly selected to either pay under the current (standard) or the new (tiered) rent policy. Under the tiered rent policy, families will pay rent based on a rent schedule within tiers of \$2,500. The rent paid by the family will be based on 28% of the midpoint of the income tier corresponding to the family income. Income will be calculated based on gross income for the prior 12-month period for existing households and the current income for newly-admitted households.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased revenue; Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

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

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

This activity will apply to non-elderly, non-disabled under both the tenant-based and project-based voucher programs. All special purpose vouchers, including VASH, EHV, Shelter Plus Care and Mainstream vouchers will be excluded.

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.

CKHA has been working closely with staff from HUD and its research partner, MDRC, to develop the policy and associated procedures and forms to implement the tiered rent study and to train staff. Study enrollment began in March 2023 for households with annual reexamination dates starting in July 2023 and new admissions beginning July 2023. Enrollment will continue for a full year.

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.

The safe harbor waivers requested for the study allow CKHA to implement the study as designed by HUD.

Please describe how the income bands are structured.

Income bands are in increments of \$2,500 in annual income. Rents are set at 1/12 of 28% of the midpoint of the tier (representing monthly income), except that households with incomes below \$2,500 will pay a minimum rent of \$50.

Please upload the tiered rent policy table that shows the income bands.

This document is attached.

What is the income basis for assigning households to income bands?

This activity uses a different definition of income because we are using the following MTW waivers (check all that apply)

1.r. and/or 1.s. "elimination of deductions"

1.j. - Alternative Utility Allowance (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

CKHA will utilize a simplified utility allowance schedule for all unit types, which will allow for an easier calculation method for staff and help families to better understand their rental payments. It will be based on the most common structure type, number of bedrooms and a base payment on the most common utilities.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

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.

The alternative utility allowance has been implemented and allows for a decreased burden on staff when calculating TTP and discussing with participants the expectations for the amount paid in rent and utilities.

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

No

Please describe the alternative method of calculating the utility allowances. Please explain how the method of calculating utility allowances is different from the standard method and what objective the MTW agency aims to achieve by using this alternative method.

CKHA is implementing a simplified utility allowance, a single utility schedule for all units and localities. The previous utility schedule consisted of nine localities and five unit classifications and the alternative utility schedule uses the most common housing structure and a base payment. The base payment contains the most common utilities and less common utilities can be add-ons. The objectives are less administrative burden on data entry and maintain the vast amounts of data, less affordability errors when selecting program participants or landlord responsibilities, unit type and locality, and improved communication to program participants and landlords on what a family can afford.

1.r. - Elimination of Deduction(s) (PH)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

As part of the tiered rent study, families who are selected to pay rent under the tiered rent policy have their rent calculated

using gross income from the prior 12 months (except new admissions have their rent calculated using current gross income). When there are extenuating circumstances that cause significant difficulty to pay the tiered rent, a hardship may be requested.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased revenue; Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

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

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

Does the MTW activity apply to all public housing developments?

The MTW activity applies to specific developments

Which developments participate in the MTW activity?

WV001000003 Orchard Manor, WV001000007 Hillcrest/Oakhurst, WV001000008 South Park, WV001000027 CRH LP 1, WV001000028 CRH LP 2, WV001000029 Harris (Rand)/Anderson (Dunbar), WV001000031 CRH LP 3, WV001000032 CRH LP 6, WV001000033 CRH LP 5, WV001000036 Starling Drive, WV001000037 729 Central Avenue, WV001000038 731 Central Avenue

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.

CKHA has been working closely with staff from HUD and its research partner, MDRC, to develop the policies procedures and forms to implement the tiered rent study and to train staff. Study enrollment began in March 2023 for households with annual reexamination dates starting in July 2023 and new admissions beginning July 2023.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Provided Already

Which deduction(s) will be eliminated, modified, or added?

Dependent allowance; Unreimbursed childcare costs

1.s. - Elimination of Deduction(s) (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

As part of the tiered rent study, families who are selected to pay rent under the tiered rent policy have their rent calculated using gross income from the prior 12 months (except new admissions have their rent calculated using current gross income). When there are extenuating circumstances that cause significant difficulty to pay the tiered rent, a hardship may be requested.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased revenue; Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

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

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

This activity will apply to non-elderly, non-disabled under both the tenant-based and project-based voucher programs. All special purpose vouchers, including VASH, EHV, Shelter Plus Care and Mainstream vouchers will be excluded.

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.

CKHA has been working closely with staff from HUD and its research partner, MDRC, to develop the policies procedures and forms to implement the tiered rent study and to train staff. Study enrollment began in March 2023 for households with annual reexamination dates starting in July 2023 and new admissions beginning July 2023.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Provided Already

Which deduction(s) will be eliminated, modified, or added?

Dependent allowance; Unreimbursed childcare costs

2.b. - Payment Standards- Fair Market Rents (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

CKHA will increase the payment standard to 120% of the Fair Market Rent. Due to the rental market increase, this payment standard increase will keep pace with that market increase and make it easier for voucher holders to find a place of their choice. This is not expected to increase the monthly amount that the tenant will pay as it is more likely that the particular unit would fall within the payment standard. This activity will use the existing MTW Hardship Policy, which has been previously approved.

Which of the MTW statutory objectives does this MTW activity serve?

Self-sufficiency; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

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 waiver is not yet approved and has not been implemented.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

Yes

Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)

2.b. - Payment Standards- Fair Market Rents (HCV); 3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)

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

Yes

What considerations led the MTW agency to modify the hardship policy?

The hardship policy relating to tiered rent has NOT been modified.

The attached hardship policy is related to the currently requested waivers relating to households that are ineligible for the Rent Reform Demonstration.

How many hardship requests have been received associated with this activity in the past year?

No hardship were requested in the most recent fiscal year.

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

Does the impact analysis apply to more than this MTW activity?

No

Please explain the payment standards by FMR:

CKHA will increase the payment standards to 120% of the FMR.

2.d. - Rent Reasonableness – Third-Party Requirement (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

CKHA uses a process that includes obtaining reasonable rent determinations from the The Nelrod Company and their national database. This ensures fair and valid determinations and increases cost effectiveness while decreasing staff administrative burden.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of

assisted households?

The MTW activity applies to all assisted households

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.

CKHA received HUD approval for this waiver and has begun implementing it. This has significantly decreased expenditures for paying for third-party services.

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

No

Please explain or upload a description of the quality assurance method.

CKHA rent reasonable process includes using rent comparables generated by the third party company, The Nelrod Company, to identify comparable units. The rent reasonableness determinations will be performed by a CKHA staff person who is trained on HCV and PBV rent reasonableness regulations, usually the Director of Voucher Management, the Chief Operations Officer will verify that processes have been followed and then a staff person from the Finance department, who is trained on HCV and PBV rent reasonableness regulations, will review to ensure independence, impartiality and integrity.

No document is attached.

Please explain or upload a description of the rent reasonableness determination method.

CKHA uses a third party company (The Nelrod Company) to generate rent comparables for the HCV and PBV programs. The reasonable rent system uses only unassisted units for comparables and considers, in each determination, location, quality, size, unit type, age, amenities, housing services, maintenance and utilities to be provided by the owner. Once the software generates comparables, a CKHA staff member who is knowledgeable about HCV and PVB rent reasonableness regulations reviews the comparables to confirm that they are comparable to the specific unit.

No document is attached.

3.a. - Alternative Reexamination Schedule for Households (PH)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

CKHA is requesting approval for an additional waiver for triennial recertifications, separate from the Rent Reform Demonstration. This request for a second waiver would allow for triennial reexaminations for households where the head, co-head, and/or spouse is 62 years of age or older. This would decrease administrative burden and burden to the older tenants.

See the FY22 MTW Supplement for a full description of this activity for families that have been assigned to pay tiered rent. This activity has been approved by HUD and is currently being implemented.

CKHA received approval to implement triennial reexaminations for families who are part of the Tiered Rent Demonstration and selected to pay under the tiered rent policy.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased revenue; Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of

assisted households?

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

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families; Elderly families

Does the MTW activity apply to all public housing developments?

The MTW activity applies to specific developments

Which developments participate in the MTW activity?

WV001000003 Orchard Manor, WV001000007 Hillcrest/Oakhurst, WV001000008 South Park, WV001000027 CRH LP 1, WV001000028 CRH LP 2, WV001000029 Harris (Rand)/Anderson (Dunbar), WV001000031 CRH LP 3, WV001000032 CRH LP 6, WV001000033 CRH LP 5, WV001000036 Starling Drive, WV001000037 729 Central Avenue, WV001000038 731 Central Avenue

For the elderly households - the MTW activity applies to all developments and is based on the age of the residents in the individual unit.

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.

CKHA has been working closely with staff from HUD and its research partner, MDRC, to develop the policies procedures and forms to implement the tiered rent study and to train staff. Study enrollment began in March 2023 for households with annual reexamination dates starting in July 2023 and new admissions beginning July 2023.

The current waiver request (for elderly households) has not yet been approved and has not been implemented.

Does this MTW activity require a hardship policy?

Provided Already

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.

The safe harbor waiver is for Tiered Rent triennials and allows CKHA to implement the tiered rent policy as designed by HUD.

Does the MTW activity require an impact analysis?

Yes

This document is attached.

Does the impact analysis apply to more than this MTW activity?

Yes

Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)

3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)

What is the recertification schedule?

Once every three years

How many interim recertifications per year may a household request?

2 or more

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

Rather than having one possible interim, there will be a hardship policy in effect so that the family may request a hardship for six months when a qualifying circumstance happens (two months for an extenuating circumstance). There is no limit to the amount of hardships a family may request.

The hardship policy affecting households that are ineligible for the Rent Reform Demonstration provides up to two hardship requests annually for a decrease in income by 10% or more or another extenuating circumstance. For a hardship due to a decrease in income, elderly households will maintain the hardship amount of ttp/rent until their next triennial reexamination. For non-elderly households, the hardship will remain in place until the next annual reexamination. For extenuating circumstances, for either type of household, the rent will be set at the minimum rent of \$50 for two months and then will return to the same amount as before the hardship.

3.b. - Alternative Reexamination Schedule for Households (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

CKHA is requesting approval for an additional waiver for triennial recertifications, separate from the Rent Reform Demonstration. This request for a second waiver would allow for triennial reexaminations for households where the head, co-head, and/or spouse is elderly. This would decrease administrative burden and burden to the older tenants.

See the FY22 MTW Supplement for a full description of this activity for tiered rent households. This activity has been approved by HUD and is currently being implemented. CKHA received approval to implement triennial reexaminations for families who are part of the Tiered Rent Demonstration and selected to pay under the tiered rent policy.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased revenue; Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

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

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families; Elderly families

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

The waiver request will apply to elderly households under both the tenant-based and project-based voucher programs.

This activity will apply to non-elderly, non-disabled under both the tenant-based and project-based voucher programs. All special purpose vouchers, including VASH, EHV, Shelter Plus Care and Mainstream vouchers will be excluded.

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.

CKHA has been working closely with staff from HUD and its research partner, MDRC, to develop the policies procedures and forms to implement the tiered rent study and to train staff. Study enrollment began in March 2023 for households with annual reexamination dates starting in July 2023 and new admissions beginning July 2023.

The current waiver request has not yet been approved and not been implemented.

Does this MTW activity require a hardship policy?

Provided Already

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.

The safe harbor waiver is for Tiered Rent triennials and allows CKHA to implement the tiered rent policy as designed by HUD.

Does the MTW activity require an impact analysis?

Provided Already

What is the recertification schedule?

Once every three years

How many interim recertifications per year may a household request?

2 or more

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

Rather than having one possible interim, there will be a hardship policy in effect so that the family may request a hardship for six months when a qualifying circumstance happens (two months for an extenuating circumstance). There is no limit to the amount of hardships a family may request.

The hardship policy affecting households that are ineligible for the Rent Reform Demonstration provides up to two hardship requests annually for a decrease in income by 10% or more or another extenuating circumstance. For a hardship due to a decrease in income, elderly households will maintain the hardship amount of ttp/rent until their next triennial reexamination. For non-elderly households, the hardship will remain in place until the next annual reexamination. For extenuating circumstances, for either type of household, the rent will be set at the minimum rent of \$50 for two months and then will return to the same amount as before the hardship.

3.c. - Self-Certification of Assets (PH)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

CKHA will allow for self-certification of assets up to \$50,000, which will ease administrative burden and burden put upon tenants to provide lengthy, often difficult to obtain, verification documentation.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

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.

CKHA received HUD approval for this waiver and has begun implementing it. This waiver appears to reduce staff burden by saving a significant amount of time not following up with third parties for verification or waiting on tenants to provide the documentation.

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

No

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

\$50,000.

3.d. - Self-Certification of Assets (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

CKHA will allow for self-certification of assets up to \$50,000, which will ease administrative burden and burden put upon tenants to provide lengthy, often difficult to obtain, verification documentation.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

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.

CKHA received HUD approval for this waiver and has begun implementing it. This waiver appears to reduce staff burden by saving a significant amount of time not following up with third parties for verification or waiting on tenants to provide the documentation.

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

No

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

\$50,000.

5.c. - Third-Party Requirement (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

CKHA performs HQS Inspections on PBV units that it owns, manages/controls.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

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

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

CKHA owned, managed or controlled under the tenant-based and project-based voucher program.

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.

CKHA received HUD approval for this waiver and has begun implementing it. This waiver has saved a significant amount of time and money by not paying outside sources and waiting on an opening in their schedule. This also allows for families to be housed more quickly.

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

No

Please explain or upload the description of the quality assurance method:

Following will explain the quality assurance method

CKHA will continue to meet the requirements under 24 CFR 982.401, while being a demonstration site for NSPIRE-V. Any staff member conducting inspections will be trained on the HQS standards. Participants will continue to be allowed to request an interim inspection. The CKHA staff member chosen, generally the Director of Voucher Management, will randomly select a sample of 5% of the inspections completed in the last 30 days to complete quality control selection.

CKHA will obtain the services of a third-party entity to determine if PHA-owned units pass HQS, upon the request of HUD.

No document is attached.

9.b. - Increase PBV Project Cap (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

Increasing PBV project caps provides for more flexible use of housing units and increased choice for tenants.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased revenue

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

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.

CKHA received HUD approval for this waiver and has begun implementing it and will continue the process, which is expanding affordable housing to a wider audience.

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

No

9.g. - Increase PBV Rent to Owner (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

CKHA is authorized to develop a local process to determine the initial and re-determined rent to owner. The agency may increase rents up to the lesser of 120% of Fair Market Rents or rent reasonableness. CKHA will be implementing this activity within the Safe Harbor limits established by the MTW Operations Notice. CKHA will increase PBV rent to the owner to make it more attractive for landlords to participate in the program. This increases the availability of housing choices and makes it more likely that existing and new landlords will want to participate.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

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 waiver has not yet been approved and is not yet implemented.

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

No

10.b.PH - Alternative Structure for Establishing Program Coordinating Committee (PH)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

CKHA will establish the Program Coordinating Committee (PCC) in coordination with the American Job Center (AJC)/One-Stop, which houses several provider agencies in one building and allows for stronger and more frequent communication as the whole or with individual partnerships. This alternative PCC will provide support for the Family Self-Sufficiency program.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

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

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

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 waiver has not yet been approved and has not been implemented.

Does this MTW activity require a hardship policy?

No

No document is attached.

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

No

Does the MTW activity require an impact analysis?

No

No document is attached.

Please describe the alternative structure and how it is designed to secure local resources to support an MTW Self-Sufficiency program.

The Family Self-Sufficiency Coordinator is a partner in the local American Job Center (AJC)/One-Stop, in which one building holds representatives from several provider agencies across the county and region. These partners hold meetings on a regular basis and when any partner is in need of specific resources.

10.b.HCV - Alternative Structure for Establishing Program Coordinating Committee (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

CKHA will establish the Program Coordinating Committee (PCC) in coordination with the American Job Center (AJC)/One-Stop, which houses several provider agencies in one building and allows for stronger and more frequent communication as the whole or with individual partnerships. This alternative PCC will provide support for the Family Self-Sufficiency program.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

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

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

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 waiver has not yet been approved and not yet been implemented.

Does this MTW activity require a hardship policy?

No

No document is attached.

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

No

Does the MTW activity require an impact analysis?

No

No document is attached.

Please describe the alternative structure and how it is designed to secure local resources to support an MTW Self-Sufficiency program.

The Family Self-Sufficiency Coordinator is a partner in the local American Job Center (AJC)/One-Stop, in which one building holds representatives from several provider agencies across the county and region. These partners hold meetings on a regular basis and when any partner is in need of specific resources.

D.	Safe Harbor Waivers.
D.1	<p>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</p> <p>No Safe Harbor Waivers are being requested.</p>

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p>No Agency-Specific Waivers are being requested.</p>
E.2	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>Does the MTW agency have any approved Agency-Specific Waivers?</p> <p>Yes</p> <p>Has there been a change in how the waiver is being implemented from when it was originally approved?</p> <p>No</p>

F.	Public Housing Operating Subsidy Grant Reporting.
F.1	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2021	\$4,652,043	\$3,457,730	\$1,194,313	2029-09-30
2022	\$5,038,721	\$5,038,721	\$0	2030-09-30
2023	\$5,457,573	\$1,819,191	\$3,638,382	2031-09-30
2024				2032-09-30

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	
	49%-30% Area Median Income	
	Below 30% Area Median Income	
	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? Yes	

G.3	Substantially the Same (STS) – Local, Non-Traditional.	
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	# of unit months	
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	# of unit months	

Number of units developed under the local, non-traditional housing development activity that were available for occupancy during the prior full calendar year:

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# 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?
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G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.	

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

H.	Public Comment
Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.	

I.	Evaluations.
Yes - This table lists evaluations of Charleston-Kanawha's MTW activities, including the names of evaluators and available reports	

Table I.1 - Evaluations of MTW Policies

Title and short description	Evaluator name and contact information	Time period	Reports available
Stepped and Tiered Rent Demonstration	Keith Olejniczak MDRC Keith.Olejniczak@mdrc.org 510-844-2306	March 1, 2023 (Official start) for the duration of the current MTW Demonstration Study	