

Charleston-Kanawha Housing Authority

Charleston, WV

Moving To Work (MTW) Supplement - Draft

April 2025 – March 2026

PHA Name: Charleston-Kanawha
PHA Code: WV001
MTW Supplement for PHA Fiscal Year Beginning: 04/01/2025
PHA Program Type: Combined
MTW Cohort Number: Stepped and Tiered Rent (#2)
MTW Supplement Submission Type: Annual Submission

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. 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.

For the fiscal year beginning April 1, 2024, waivers were added allowing CKHA to increase housing choices by increasing PBV rent to owner up to 120%, establishing and implementing payment standards based on 120% of Fair Market Rents (FMR). Additionally, waivers were added to allow elderly/disabled households to complete reexaminations triennially rather than annually, significantly decreased staff and tenant burden and another to create an alternate structure for securing local resources to support a Family Self-Sufficiency Program with MTW flexibilities.

The current supplement includes three waiver requests. CKHA is requesting modification to the terms of the FSS Contract of Participation to be five years from the date of enrollment, unless an approved extension is granted. Additionally, CKHA is requesting to waive the requirement to provide a tenant-based voucher after residing in a PVB for 12 months, extending the time frame to 24 months, with the

exception for approved requested for reasonable accommodation. Finally, CKHA is requesting limiting portability moves outside of jurisdiction only to housing authorities that will adsorb or administer payment standards at or below the amounts applicable in CKHA’s jurisdiction.

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

1a./1b. – Tiered rent PH & HCV - Currently Implementing

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.

Statutory Objectives - Cost effectiveness; self-sufficiency

Cost Implications – Decreased revenue; decreased expenditures

Application

The MTW activity applies only to a subset or subsets of assisted households; new admissions & currently assisted households; only to selected family types: non-elderly & non-disabled families.

PH Specific Developments

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

HCV unit description

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.

Description accomplishment

CKHA worked closely with staff from HUD and its research partner, MDRC, to develop the policies 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 and continued for one calendar year.

Safe harbor – YES. The safe harbor waivers requested for the study allow CKHA to implement the study as designed by HUD. Safe Harbor Waiver has been previously approved. The safe harbor waivers requested for the study allow CKHA to implement the study as designed by HUD.

Income bands

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.

This activity uses a different definition of income because we are using the following MTW waivers – 1.r. and/or 1.s. “elimination of deductions.”

See Exhibit A. Tiered Rent Chart (28% midpoint)

1.j alternative utility allowance (HCV) – Currently Implementing

1.i. alternative utility allowance (PH) was discontinued in a previous submission year

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.

Statutory Objectives - Cost effectiveness; housing choice

Cost Implications – Decreased expenditures

Application - Applies to all assisted households

Description - 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.

Safe harbor – NO

Description of alternative method of calculating utility allowances – 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/1.s. elimination of deductions PH & HCV – Currently Implementing

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.

Statutory Objectives - Cost effectiveness

Cost Implications – Increased revenue; Decreased expenditures

Application

The MTW activity applies only to a subset or subsets of assisted households; new admissions & currently assisted households; only to selected family types: non-elderly & non-disabled families.

PH Specific Developments

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

HCV unit description

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.

Accomplished

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.

Hardship Policy – YES; applies to MTW activities: 1.r./1.s. Elimination of deductions PH & HCV; 3.a./3.b. Alternative reexamination schedule for households PH & HCV

See Exhibit B. Hardship Exception Policy for Tiered Rent Households

Safe harbor – NO

Impact Analysis – Provided Already

What deductions will be eliminated, modified, or added? Dependent allowance; unreimbursed childcare costs

2. Payment Standards and Rent Reasonableness

2.b Payment Standards – Fair Market Rents (HCV) – Currently Implementing

CKHA will increase the payment standard up 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.

Statutory Objectives – Self-Sufficiency; Housing choice

Cost Implications – Increased expenditures

Application - The MTW activity applies to all assisted households.

Accomplished – CKHA has seen an increase in affordability, which benefits tenants while increasing access to housing and housing choice. The downside is the additional cost to CKHA in a rapidly expanding rent market.

Hardship Policy – YES; applies to MTW activities: 2.b. Payment Standards – Fair Market Rents (HCV); 3.a./3.b. Alternative reexamination schedule for households PH & HCV

Neither hardship policy has been modified.

See Exhibit C. MTW Hardship Policy Affecting Households Ineligible for the Rent Reform Study

Hardships Requested – No hardships were requested in the most recent fiscal year.

Safe harbor – NO

Impact Analysis – Provided Already – only for this activity

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

2.d – Rent Reasonableness – Third-party requirement (HCV) – Currently Implementing

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 a third-party company and their national database. This ensures fair and valid determinations and increases cost effectiveness while decreasing staff administrative burden.

Statutory Objectives – Cost effectiveness

Cost Implications – Decreased expenditures

Application - The MTW activity applies to all assisted households.

Accomplished – Resulted in a significant decrease for expenditures related to paying for third-party services.

Safe harbor – NO

Quality assurance method

CKHA's reasonable process includes using rent comparables generated by an energy consumption consultant 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.

Rent reasonableness determination method

CKHA uses a third-party energy consumption consultant 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.

3. Reexaminations

3.a./3.b. Alternative Reexamination Schedule for Households PH & HCV- Currently Implementing

An additional waiver for triennial recertifications, separate from the Rent Reform Demonstration has been approved. This request for a second waiver allows for triennial reexaminations for households where the head, co-head, and/or spouse is elderly or disabled. This decreases administrative burden and burden on the older/disabled tenants. In the case of PH households, no adjustments are made to the tenant file unless there is a change in household composition, or a hardship is requested. For HCV households, there is an update completed annually between triennial recertifications.

See the FY22 MTW Supplement for a full description of this activity related to households assigned to 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.

Statutory Objectives – Cost effectiveness; Self-Sufficiency

Cost Implications – Decreased revenue; decreased expenditures

Application - The MTW activity applies only to all assisted households, new admissions and currently assisted households. Applies only to selected family types, previously approved waiver related to tiered rent - non-elderly, non-disabled.

Waiver related to tiered rent - HCV unit description

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, COC and Mainstream vouchers will be excluded.

Waiver related to elderly/disabled households (PH & HCV) - Triennial waiver related to Elderly/disabled households – MTW activity applies to all developments and is based on the age and disability status of the residents in the individual unit.

For HCV, this waiver applies to all elderly/disabled households under both the tenant-based and project-based voucher programs.

Accomplished - 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. Enrollment ended after one calendar year.

The triennial waiver related to elderly/disabled households has not yet been implemented.

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

Impact Analysis – YES, provided already. Applies to 3.a. Alternative Reexamination Schedule for Households (PH) and 3.b. Alternative Reexamination Schedule for Households (HCV)

Recertification schedule – Once every three years

Interim Recertifications – 2 or more

Addressing 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 number of hardships a family may request.

A hardship policy applicable to the current request (elderly/disabled households) is separate. The hardship policy affecting households that are ineligible for the Rent Reform Demonstration allows for a hardship request for a decrease in income by 10% or more or another extenuating circumstance. For a hardship due to a decrease in income, elderly/disabled households will maintain the hardship amount of TTP/Rent for six months. For an extenuating circumstance, the TTP/Rent will be set at \$50 for two months before returning to the pre-hardship amount.

3.c./3.d Self-Certification of Assets PH & HCV – Currently Implementing

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.

Statutory Objectives – Cost effectiveness; Self-Sufficiency

Cost Implications – Decreased expenditures

Application - The MTW activity applies to all assisted households

Accomplished - 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.

Threshold: 50,000

5. Housing Quality Standards (HQS)

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

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.

Statutory Objectives – Cost effectiveness

Cost Implications – Decreased expenditures

Application - The MTW activity applies only to a subset or subsets of assisted households, new admissions and currently assisted households.

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

Accomplished - 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.

Safe harbor – No

Quality Assurance Method - CKHA will continue to meet the requirements under 24 CFR 982.401 and NSPIRE-V. Any staff member conducting inspections will be trained on the HQS/NSPIRE-V standards. Participants will continue to be allowed to request a special 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/INSPIRE-V, upon the request of HUD.

9. Project-Based Voucher Program Flexibilities

9.b Increase PVB Project Cap (HCV) – Currently Implementing

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.

Statutory Objectives – Cost effectiveness; Housing choice

Cost Implications – Increased revenue

Application - The MTW activity applies to all assisted households, new admissions and currently assisted households.

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

Accomplished - CKHA received HUD approval for this waiver and has begun implementing it. This waiver allows expansion of affordable housing to a wider audience.

Safe harbor – No

9.g Increase PBV Rent to Owner (HCV) – Currently Implementing

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 implements this activity within the Safe Harbor limits established by the MTW Operations Notice. CKHA increased 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.

Statutory Objectives – Housing choice

Cost Implications – Increased expenditures

Application - The MTW activity applies to all assisted households, new admissions and currently assisted households.

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

Accomplished - CKHA received HUD approval for this waiver and has begun implementing it. This waiver allows for increased housing choices. Currently, the increase hasn't reached 120% at all properties due to the increased expenditure amount.

Safe harbor – No

9.h Limit Portability for PBV Units (HCV) – Requesting/Plan to Implement in the submission year

The agency is authorized to waive the requirement to provide a tenant-based voucher at 12 months: rather a tenant-based voucher will be granted (depending upon availability) at 24 months, with the exception for approved requests for reasonable accommodation according to existing rules. This

limitation will not apply to portability moves that are justified under laws and regulations applicable to the federal Violence Against Women Act and/or those that support a reasonable accommodation. Currently assisted households will not be impacted.

Statutory Objectives – Cost effectiveness

Cost Implications – Decreased expenditures

Application – Applies to only a subset or subsets of assisted households – new admissions. The MTW activity applies to all family types at all developments and all properties with project-based vouchers. v.

NOTE: (REQUIRED by Safe Harbor) The agency must have a clear and uniform policy in place to address how move requests are received and how they are approved/denied for PBV households.

10. Family Self-Sufficiency Program with MTW Flexibility

10.b. PH/HCV Alternative Structure for Establishing Program Coordinating Committee (HCV & PH) – Currently Implementing

CKHA established 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 a whole or with individual partnerships. This alternative PCC provides support for the FSS program.

Statutory Objectives – Cost effectiveness

Cost Implications – Neutral (no cost implications)

Application - The MTW activity applies only to a subset or subsets of assisted households, new admissions and currently assisted households.

The MTW activity applies to all family types at all developments and all properties with project-based vouchers.

Accomplished - CKHA received HUD approval for this waiver and has begun implementing it. This waiver has saved a significant amount of time by not requiring coordination between multiple agencies to attend multiple meetings. Having PCC meetings in conjunction with the monthly meeting at the American Job Center provides immediate access to the most referred agencies.

Hardship Policy - No

Safe harbor – No

Impact Analysis – No

The Family Self-Sufficiency Coordinators are partners 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 monthly and when any partner needs specific resources.

10.d. PH/HCV Modify or Eliminate the Contract of Participation (HCV & PH) – Plan to Implement in the Submission Year

The Family Self-Sufficiency (FSS) Contract of Participation (CoP) will be modified for new FSS program enrollees to a 5-year period, beginning the first day of the month following the family's enrollment appointment. All other changes to the CoP resulting from the FSS Final Rule will remain in the modified CoP. Reverting back to a 5-year contract for all new program participants will be cost-effective by decreasing CKHA's expenditures, as it will require one year less of escrow (or three years less for those paying tiered rent) that CKHA would potentially pay out. This change will still encourage self-sufficiency, as participants will be afforded adequate time to complete their goals and will be eligible for an extension if needed. CKHA's goal for this change is to simplify the process of determining the FSS contract end date and ensure consistency in the time offered to participants. Both participants and staff will benefit from the consistency of the new model. The modifications will lessen the administrative burden for staff and participants, achieve greater cost-effectiveness in federal expenditures, and eliminate confusion for participants.

Statutory Objectives – Cost effectiveness

Cost Implications – Decreased expenditures

Application - The MTW activity applies only to a subset or subsets of assisted households, currently assisted households.

The MTW activity applies to all family types at all developments and all properties with project-based vouchers.

Hardship Policy - No

Safe harbor – No

Impact Analysis – No

Agency Specific Waiver –

Modification to the Income Verification Hierarchy (Notice PIH 2018-18) for recertifications (tiered rent households) – EIV < Self-Certification – Currently Implementing

Agency Specific Waiver – Limit Portability Moves out of Jurisdiction - REQUESTED

Charleston-Kanawha Housing Authority

Agency Specific Waiver – Limit Portability Moves out of Jurisdiction

Exhibit D. Impact Analysis for Agency-Specific Waiver – Limit Portability Moves Outside of Jurisdiction

Describe the MTW activity (including what specifically the agency is proposing to waive), the MTW agency’s goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.

CKHA is proposing to waive certain provisions of 24 CFR 982.353(b), 982.355, and 982.636 to approve portability only to housing authorities who will absorb the incoming family or administer Fair Market Rents up to or below 110% of the amounts applicable in CKHA’s jurisdiction. This limitation will not apply to portability moves that are justified under laws and regulations applicable to the federal Violence Against Women Act and/or those that support a reasonable accommodation. Households that have ported their voucher to another PHA before this waiver has been approved will not be impacted.

CKHA’s goal for this activity is to achieve greater cost effectiveness in federal expenditures. With limited HAP resources, CKHA can best serve its participants by utilizing those funds to serve the most households possible. Other markets in the country have costs far exceeding the average HAP in CKHA’s jurisdiction and continuing to pay those costs diminishes the budget for housing families within the jurisdiction.

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 expenditure.

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

This waiver applies to all 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?

This waiver applies to new admissions.

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

This waiver applies to all family types.

Please select the family types subject to this MTW activity.
All family types.
If Other Selected in Previous Question: Please describe this target population.
n/a
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?
This waiver applies to all assisted households.
Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.
This waiver applies to all assisted households.
Which Public Housing developments will participate in this activity?
All assisted households at all developments that apply.
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
Implementation timeline.
CKHA plans to implement this initiative beginning in April 2025.
Impact analysis.
See separate attachment.
Description of a hardship policy, if needed.
Households may be exempt from this policy if their move is related to VAWA or a reasonable accommodation. In addition, households may request a hardship by completing the Hardship Request Form with an explanation and proof of the hardship requiring portability, as needed.
Describe the MTW activity (including what specifically the agency is proposing to waive), the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.
CKHA is proposing to waive certain provisions of 24 CFR 982.353(b), 982.355, and 982.636 to approve portability only to housing authorities who will absorb the incoming family or administer Fair Market Rents up to 110% of FMR in CKHA's jurisdiction. This limitation will not apply to portability moves that are justified under laws and regulations applicable to the federal Violence

Against Women Act and/or those that support a reasonable accommodation. Households that have ported their voucher to another PHA before this waiver has been approved will not be impacted.

CKHA's goal for this activity is to achieve greater cost effectiveness in federal expenditures. With limited HAP resources, CKHA can best serve its participants by utilizing those funds to serve the most households possible. Other markets in the country have costs far exceeding the average HAP in CKHA's jurisdiction and continuing to pay those costs diminishes the budget for housing families within the jurisdiction.

Exhibit A. Tiered Rent Chart (28% midpoint)

Tiered Rent Chart (28% midpoint)

Tier	Tier Income Minimum	Tier Income Maximum	Tiered Rent 28%
1	\$0	\$2,499	\$50
2	\$2,500	\$4,999	\$87
3	\$5,000	\$7,499	\$146
4	\$7,500	\$9,999	\$204
5	\$10,000	\$12,499	\$262
6	\$12,500	\$14,999	\$321
7	\$15,000	\$17,499	\$379
8	\$17,500	\$19,999	\$437
9	\$20,000	\$22,499	\$496
10	\$22,500	\$24,999	\$554
11	\$25,000	\$27,499	\$612
12	\$27,500	\$29,999	\$671
13	\$30,000	\$32,499	\$729
14	\$32,500	\$34,999	\$787
15	\$35,000	\$37,499	\$846
16	\$37,500	\$39,999	\$904
17	\$40,000	\$42,499	\$962
18	\$42,500	\$44,999	\$1,021
19	\$45,000	\$47,499	\$1,079
20	\$47,500	\$49,999	\$1,137
21	\$50,000	\$52,499	\$1,196
22	\$52,500	\$54,999	\$1,254
23	\$55,000	\$57,499	\$1,312
24	\$57,500	\$59,999	\$1,371
25	\$60,000	\$62,499	\$1,429
26	\$62,500	\$64,999	\$1,487
27	\$65,000	\$67,499	\$1,546
28	\$67,500	\$69,999	\$1,604
29	\$70,000	\$72,499	\$1,662
30	\$72,500	\$74,999	\$1,721
31	\$75,000	\$77,499	\$1,779

Charleston-Kanawha Housing Authority (CKHA)

MOVING TO WORK (MTW) HARDSHIP POLICY AFFECTING TIERED RENT

This Hardship Policy applies to the following MTW activities (for those households selected as MTW Tiered Rent program participants):

- 1) Tenant Rent Policies – Elimination of deductions while using gross income to calculate rent and
- 2) Reexaminations – Establishment of triennial reexamination schedule (allowing for hardship requests and/or automatic adjustment via hardship policy if current gross income level drops into lower tier than retrospective income)

Tiered Rent Hardship Policy - Overview

The Tiered Rent policy is intended to benefit assisted households by allowing them to increase their income without an immediate increase in their total tenant payment (TTP) for HCV families or Tenant Rent for Public Housing residents. Households will have an income examination every three years, and in between the triennial reexaminations their tiered rent will not increase. However, some households may need special accommodations to avoid negative consequences of placement in the tiered rent.

General Hardship Provisions

Hardships must be requested by the household in writing, with the exception of automatic hardships processed by CKHA during the first or subsequent triennial income examinations. Hardships should use CKHA's MTW Request for Hardship Exception form.

CKHA will temporarily approve the hardship beginning the first day of the next month after the receipt of a valid hardship request indicating qualifying circumstances. This hardship will be based on the tier corresponding to the household's current gross income, reported by the household in their hardship request. The household will be required to provide the required documentation within 14 business days, to enable CKHA to verify the hardship. CKHA will decide whether to deny or approve the hardship within 14 business days of receiving required documentation. If the hardship request is denied, the household may be required to enter into a repayment agreement.

If the hardship is approved, and the household subsequently experiences another adverse event while still in hardship status, they may request an additional hardship that might further reduce their TTP. There is no limit to the number of hardships that a household may receive.

If a household is approved, they are not required to report income increases during the period of their approved hardship and it will not end early. At least thirty days prior to the expiration of the tiered rent hardship, the household will be notified of returning to their rent portion set at their last triennial recertification.

If the head of household, spouse, or co-head of household becomes elderly or disabled, the household is eligible to be excluded from the tiered rent and return to the traditional income-based rent policy.

This hardship policy presents eligibility criteria and remedies for different types of hardships. If a household's circumstances correspond to more than one type of hardship, they will receive the hardship most beneficial to them.

Hardship Types, Criteria, and Remedies

- I. **Hardship Due to Elimination of Deductions.** Some families may face a hardship due to the tiered rent policy's reliance on gross income (with no deductions) instead of adjusted income. The childcare deduction requires special attention because childcare can be very expensive and because paid childcare is often essential for enabling parents to work.

Automatic hardship at enrollment or triennial reexamination: CKHA conducts a full income reexamination (at enrollment to the tiered rent, and again three years later) for newly admitted households or for those currently receiving assistance; if the household has \$2,500 or more of eligible out-of-pocket childcare expenses annually, CKHA will deduct that sum from their current gross income and assign a hardship rent based on the tier that corresponds to their adjusted current income.

Hardship requested by household: Any household participating in the tiered rent study whose circumstances change such that they would have \$2,500 or more of out-of-pocket childcare expenses annually, may request a hardship by submitting a completed MTW Request for Hardship Exception form.

Eligibility: A household will be eligible for this hardship exemption if they have \$2,500 or more out-of-pocket childcare expenses annually.

When approved, a hardship agreement will be in effect for **six months only.** An additional written request will need to be completed for an additional hardship. Prior to the expiration of the tiered rent hardship, the household will be notified of their rent portion set at their last triennial recertification.

- II. **Hardship Due to Reduced Income.** Households participating in the tiered rent may be eligible for a hardship if their income decreases.

Automatic hardship: When CKHA conducts an income examination (at the time of enrollment, and at subsequent triennial income reexaminations), CKHA will

compare the household's current income with their prior year/retrospective income. If the household's current gross income would place them in a lower income tier than their prior year/retrospective gross income, CKHA will automatically determine whether the household is eligible for a hardship.

Hardship requested by household: At any time other than enrollment and triennial income reexaminations, a hardship must be requested by the household by submitting a completed MTW Request for Hardship Exception form.

Eligibility: A household will be eligible for this hardship exemption if current gross income corresponds to a lower income tier than the tier they were placed in at the last income recertification.

When approved, a hardship agreement will be in effect for **six months only**. An additional written request will need to be completed for an additional or continued hardship. Prior to the expiration of the tiered rent hardship, the household will be notified of their rent portion set at their last triennial recertification.

III. Other Circumstances. A household may request a hardship exemption for other circumstances not outlined above, such as the death of a family member, a significant increase in reasonable and necessary out-of-pocket expenses because of changed circumstances (for example, a large medical bill), or if the household is facing eviction due to inability to pay the rent. CKHA will consider these requests on a case-by-case basis and decisions will be made by CKHA's hardship review panel; the hardship review panel will consist of the MTW Coordinator, one Housing Specialist/PH Manager, and the HCV/PH Program Director.

Eligibility: The hardship review panel determines that circumstances beyond the household's control make it difficult for the household to pay the tiered rent TTP, and a temporary rent reduction is necessary.

CKHA will set the household's TTP to the \$50 minimum rent for **two months**.

Prior to the expiration of the tiered rent hardship, the household will be notified of their rent portion set at their last triennial recertification.

Appeals

For procedures pertaining to grievance hearing requests based upon CKHA's denial of a hardship exemption, see Chapter 16, Program Administration (HCV) or Chapter 14, Grievances and Appeals (PH).

Charleston-Kanawha Housing Authority (CKHA)

**MOVING TO WORK (MTW) HARDSHIP POLICY AFFECTING HOUSEHOLDS
INELIGIBLE FOR THE RENT REFORM STUDY**

This Hardship Policy applies to the following MTW activities (for those households INELIGIBLE for the Rent Reform Demonstration):

- 1) Payment Standards (HCV) based on 120% of Fair Market Rent – waiver 2.b.
- 2) Project-Based Voucher Program Flexibilities (PBV) increasing rent to owner – waiver 9.g.
- 3) Reexaminations (PH & HCV) establishing a triennial reexamination schedule for households whose head, co-head or spouse is age 62 or above and/or disabled and at least one source of current income in the household is fixed income (e.g. social security, pension), for which annual Cost of Living Adjustment (COLA) applies. – waivers 3.a. & 3.b

Overview

The waivers above are intended to benefit assisted households by increasing payment standards (HCV) and rent to owner (PBV) resulting in increased housing choices available. Additionally, establishing a triennial reexamination schedule for elderly households allowing them to increase their income and/or benefits without an immediate increase in their total tenant payment (TTP) for HCV families or Tenant Rent for Public Housing residents. Elderly/disabled households will have an income examination every three years, and in between the triennial reexaminations their portion of rent will not increase for Public Housing. For HCV households, there will be an annual update that could increase the TTP. However, some households may need special accommodations when there is a decrease in income and/or benefits or extenuating circumstances. Non-Elderly/Disabled and Non-Tiered households will continue to have annual reexaminations.

General Hardship Provisions

Hardships must be requested by the household in writing. Hardships should use CKHA's MTW Request for Hardship Exception form.

CKHA will temporarily approve the hardship beginning the first day of the next month after the receipt of a valid hardship request indicating qualifying circumstances. The household will be required to provide the required documentation within 14 business

days, to enable CKHA to verify the hardship. CKHA will decide whether to deny or approve the hardship within 14 business days of receiving required documentation. If the hardship request is denied, the household may be required to enter into a repayment agreement.

If the hardship is approved, and the household experiences another adverse event or loss of income, they may request an additional hardship.

Hardship Types, Criteria, and Remedies

I. Hardship Due to a decrease in household income by 10% or more.

A household will be eligible for this hardship exemption if they have a decrease in overall household income of 10% or more.

When approved, the TTP/Tenant Rent amount determined by the hardship for decreased income will remain in place for six months.

II. Other Circumstances. A household may request a hardship exemption for other circumstances, such as the death of a family member, a significant increase in reasonable and necessary out-of-pocket expenses because of changed circumstances (for example, a large medical bill), or if the household is facing eviction due to inability to pay the rent. CKHA will consider these requests on a case-by-case basis and decisions will be made by CKHA's hardship review panel; the hardship review panel will consist of the MTW Coordinator, one Housing Specialist/PH Manager, and the HCV/PH Program Director.

Eligibility: The hardship review panel determines that circumstances beyond the household's control make it difficult for the household to pay the tiered rent TTP, and a temporary rent reduction is necessary.

CKHA will set the household's TTP to the \$50 minimum rent for **two months**.

Appeals

For procedures pertaining to grievance hearing requests based upon CKHA's denial of a hardship exemption, see Chapter 16, Program Administration (HCV) or Chapter 14, Grievances and Appeals (PH).

Charleston-Kanawha Housing Authority

Limit Portability Moves out of Jurisdiction Impact Analysis

MTW Activities Covered by Impact Analysis
Agency Specific Waiver: Limit Portability Moves out of Jurisdiction
1. Impact on the agency’s finances (e.g., how much will the activity cost, any change in the agency’s per family contribution)
<p>CKHA does not expect any change in households’ contributions due to this waiver. Based on 2023’s portability accounts, there were nine households who ported out and are currently being administered by another housing authority. CKHA expects to save approximately \$161,148 in HAP costs in the first year. This amount will then be compounded each year by savings from additional portability accounts.</p> <p>Currently, the average per unit cost (PUC) for a ported voucher being administered by another PHA was \$1,281.58. In comparison, the average PUC for assisted households within CKHA’s jurisdiction was \$642.10. CKHA currently has 33 households being administered by another PHA. Of those 33, 85% (28) have higher PUCs than CKHA’s jurisdictional average. If CKHA was only paying out the average HAP in our jurisdiction for these households, it would save \$214,865.28 annually. While these exact families will not be impacted by this waiver as they have already ported out, their HAP costs can help us to estimate the savings CKHA expects.</p>
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)
No expected impact.
3. Impact on the agency’s waitlist(s) (e.g., any change in the amount of time families are on the waitlist)
No expected impact.
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)
No expected impact.
5. Impact on the agency’s current occupancy level in public housing and utilization rate in the HCV program
No expected impact.

6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice
This MTW activity is expected to assist CKHA in meeting the statutory goal of cost effectiveness by decreasing HAP and Administrative fees paid out to higher cost jurisdictions.
7. Impact on the agency’s ability to meet the MTW statutory requirements
No expected impact.
8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity
CKHA expects to receive a minimal number of hardship requests related to this waiver and has built in the exceptions for VAWA and reasonable accommodations to cover some of the requests.
9. Across the other factors above, the impact on protected classes (and any associated disparate impact)
CKHA does not expect this activity to have a differential impact on protected classes.