# NOTE FROM THE HOUSING AUTHORITY OF THE CITY OF ALAMEDA

The Housing Authority of the City of Alameda (AHA) will be submitting form HUD-50075-MTW electronically through the Moving to Work (MTW) portal to HUD upon approval of its Board of Commissioners after a public process. Please find the original form HUD-50075-MTW on HUD's website at:

https://www.hud.gov/program\_offices/public\_indian\_housing/programs/ph/mtw/expansio n/mtwsupplement. This document contains the information in the HUD form, but in an easier to read format, including larger print in a format that will be accessible to persons with disabilities when posted online. Most of the instructions and questions in the document are copied directly from the form HUD-50075-MTW (01/2021).

# EXPLANATORY NOTE TO PUBLIC REVIEWERS OF THE PROPOSED MOVING TO WORK SUPPLEMENT FILLABLE FORM

The Moving to Work (MTW) Supplement collects information about policies implemented by MTW expansion agencies. MTW agencies use it to communicate their plans with residents and community stakeholders through required public comment processes, and HUD uses the information collected to monitor and evaluate the MTW demonstration program. MTW agencies will submit the MTW Supplement to HUD annually and amend as needed. HUD plans to make the MTW Supplement into a fillable form so as to reduce respondent burden and make the information collected more useful to HUD. When the MTW Supplement is available through the fillable form, it will include skip patterns<sup>1</sup> that prompt the user to populate only the sections relevant to what they are currently implementing. It will also include screening questions that will ask which waivers and associated activities they are currently implementing, plan to implement in the upcoming year, or will be discontinued in the submission year. The MTW Agency will be able to print the information from the MTW Supplement in a reader-friendly format in order to inform the public of its plans for the upcoming year. The purposes of the MTW Supplement are two-fold: it reports to HUD what is happening at the local level in a way that the Department can monitor and evaluate; and, more importantly, it informs the public about what the agency is planning and gives the public the ability to provide comment.

The MTW Supplement asks for information about each of the MTW Waivers and associated activities that are made possible by the MTW Operations Notice, Safe Harbor Waivers and Agency-Specific Waivers, and a few other types of information. MTW agencies will fill in information/data through a fillable form and the information collected will be stored in a database so that it can be analyzed by HUD. The approved forms will be posted to the MTW website for viewing by the public. For instance, it will be simple to find out how many MTW agencies and which MTW agencies are implementing each type of activity. It will also simplify reporting for the MTW agency since information will carry

<sup>&</sup>lt;sup>1</sup> A skip pattern is a question or series of questions associated with a conditional response.

over year-to-year in the fillable form so that information that does not change from year to year will be pre-populated, thereby reducing respondent burden.

This document lists the sections of the MTW Supplement and then presents the proposed questions to be included in the MTW Supplement for MTW agencies to answer annually. Throughout the online version, there will be a dropdown menu option that makes it clear as to which activities an agency is permitted to do within the safe harbors of the MTW Operations Notice, Appendix I, MTW Waivers.

#### Sections of the MTW Supplement:

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

#### Information to be Collected for MTW Activities

There are many MTW activities, subject to limitations as outlined in the MTW Operations Notice, that an MTW agency may implement. Each MTW agency will likely only engage in a subset of these MTW activities. The MTW Supplement will first ask MTW agencies to identify which MTW activities they are proposing to implement and which of those MTW activities they are already implementing. MTW agencies will subsequently be asked to provide information only about the MTW activities they are proposing to implement or are already implementing. This feature will reduce respondent burden. MTW waivers have associated MTW activities. MTW agencies are also able to combine MTW activities into their own initiatives.

MTW agencies will be asked for specific information about each MTW activity they are proposing to implement or are already implementing. There are six types of questions that could be asked about each MTW activity. The exact mix of questions will depend partly upon the MTW activity and partly upon the requirements for that MTW activity listed in the MTW Operations Notice. The six types of questions are:

- (1) Core—questions applicable to most MTW activities
- (2) Custom—questions specific to an individual MTW activity
- (3) Safe Harbor Waiver—questions asked when the MTW activity requires a Safe Harbor Waiver
- (4) Hardship Policy—questions asked when the MTW Operations Notice requires a hardship policy for the MTW activity
- (5) Impact Analysis—questions asked when the MTW Operations Notice requires an impact analysis for the MTW activity

(6) Agency-Specific Waiver—questions asked when the MTW activity requires an Agency-Specific Waiver

#### Questions

The questions are presented below by type, beginning with the core questions. In the final online version of the MTW Supplement, the relevant questions from each type will be asked together in relation to each MTW activity the MTW agency is proposing to implement or is already implementing. The final online version of the MTW Supplement will be set up to allow for different versions of the same MTW activity—for instance, a different minimum rent for the non-elderly/non-disabled than for the elderly/disabled. The final online version of the MTW Supplement will also be able to autofill items with information from previous years. This feature will reduce respondent burden.

Table 1, at the end of this document, lists the MTW activities and indicates which types of questions need to be asked about each one.

## MTW SUPPLEMENT TO THE ANNUAL PHA PLAN

U.S. Department of Housing and Urban Development Office of Public and Indian Housing

OMB. No. 2577-0226

Expires: 03/31/2024

**Purpose.** The Moving to Work (MTW) Supplement to the Annual PHA Plan informs HUD, families served by the PHA, and members of the public, about the MTW Waivers and associated activities that the MTW agency seeks to implement in the coming Fiscal Year and updates the status of MTW activities that have been previously approved. It also provides information about Safe Harbor Waivers, Agency-Specific Waivers, compliance with MTW statutory requirements, and evaluations. The MTW Supplement does not replace the PHA Plan. MTW agencies must continue to submit the applicable PHA Plan. MTW agencies that are not required to submit annual PHA Plans under the Housing and Economic Recovery Act of 2008 (HERA) must submit the MTW Supplement annually, in addition to holding public hearings, obtaining board approval, and consulting with Resident Advisory Boards (RABs) and tenant associations, as applicable, on planned MTW activities.

**Applicability.** Form HUD-50075-MTW is to be completed annually by all MTW agencies brought onto the MTW Demonstration Program pursuant to Section 239 of the Fiscal Year 2016 Appropriations Act, P.L. 114-113 (2016 MTW Expansion Statute) or legacy MTW agencies that chose to follow the requirements of the MTW Operations Notice.

**Definitions.** All terms used in this MTW Supplement are consistent with the definitions stated in the MTW Operations Notice, including:

(1) Local, Non-Traditional Activities (LNT) – Those MTW activities that use MTW funding flexibility outside of the Housing Choice Voucher (HCV) and public housing programs established in Sections 8 and 9 of the U.S. Housing Act of 1937.

- (2) Safe Harbors The additional parameters or requirements, beyond those specified in the MTW activity description itself found in the MTW Operations Notice, following each activity description, that the MTW agency must follow in implementing MTW activities.
- (3) **Substantially the Same Requirement** A statutory MTW requirement that MTW agencies must continue to assist substantially the same total number of eligible low-income families as would have been served absent the MTW demonstration.

## A. PHA INFORMATION

A.1 PHA Name: Housing Authority of the City of Alameda PHA Code: CA062 MTW Supplement for PHA Fiscal Year Beginning (MM/DD/YYYY): 07/01/2025 PHA Program Type: □Public Housing (PH) only □ Housing Choice Voucher (HCV) only □ Combined MTW Cohort Number: 4 (Landlord Incentives) MTW Supplement Submission Type: □ Annual Submission

# **B. NARRATIVE**

## B.1 MTW Supplemental Narrative.

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

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

The primary goal of the Housing Authority of the City of Alameda (AHA), in partnership with the entire community, is to advocate and provide quality, affordable, safe housing;

encourage self-sufficiency; and strengthen community inclusiveness and diversity in housing. AHA's Vision Statement is: "The Housing Authority of the City of Alameda shall continue to be recognized for creatively seeking ways to expand the availability of affordable housing through Alameda, for caring professional staff, and excellent service provided fairly to all".

During participation in the Landlord Incentives Cohort the AHA will be using creative methods to encourage new landlord participation and continued landlord partnerships expanding housing choice for all voucher holders. During this cohort study, the AHA will continue to develop and maintain quality affordable housing for low-income residents, providing more housing choice along the entire spectrum of housing continuum. The AHA would like to design, implement, and sustain exceptional programs that invest in the residents to become self-sufficient through an array of educational, employment, and economic platforms including exploring the possibility of offering incentives to families to participate in training programs or increasing the ability of participants to attend community college or universities.

The AHA will strive to further the MTW statutory objective to reduce cost and achieve greater cost effectiveness in federal expenditures by continuing the activities proposed for FY 2022-2023 such as moving to a triennial reexamination and inspection schedule and allowing for the self-certification of assets and continuing activities proposed for FY 2023-2024 such increasing rents for PBV units at AHA's fiscal year rather than the contract's anniversary date.

The AHA will strive to further the MTW statutory objective to give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient by continuing the activities proposed for FY 2022-2023.

The AHA proposes to use MTW funds flexibly to increase housing choice through acquisition, rehabilitation, and/or development. AHA may use MTW funds flexibly to make Faircloth-to-RAD transactions feasible by supplementing the RAD rents as housing assistance payments or to pay for acquisition, rehabilitation or construction costs or contributing to development costs in another manner. The AHA is increasing housing choices for low-income families by using its 120-unit Faircloth-to-RAD authorization to produce additional project-based vouchers at Independence Plaza. The AHA will accept the Faircloth limit as offered by other jurisdictions to expand affordable housing by using these Faircloth limits in a manner similarly to the AHA's limit with Faircloth-to-RAD with additional MTW funds.

With the exception of MTW Activity 2022-01 2.b. Payment Standards – Fair Market Rents (HCV), activities will not apply to VASH, SV, or EHV participants. On October 7, 2024, the AHA requested to apply several of its approved MTW activities to its VASH, EHV, and SV program. The AHA is still awaiting approval from HUD and will update it's plans and notify affected households upon receiving approval.

# C. MTW WAIVERS AND ASSOCIATED ACTIVITIES

NOTE: MTW agencies are reminded that all MTW Waivers and associated activities must be implemented in accordance with the MTW Operations Notice and within its safe harbors unless a Safe Harbor or Agency-Specific Waiver approval is provided by HUD, in which case, the activity utilizing the Safe Harbor or Agency-Specific Waiver must be implemented in accordance with the terms of the approval.

#### Screener:

For all MTW Waivers and Activities in Section C, the screening question listed below will be presented in the fillable form. This will allow the form to only display those waivers that input where is required.

Each waiver and activity will be listed with the following choices. If "Not Currently Implemented" is selected, the agency will not be shown any further questions for the activity.

- Currently Implementing
- Plan to Implement in the Submission Year
- Will be Discontinued in the Submission Year
- Was Discontinued in a previous Submission Year
- Not Currently Implemented

#### **Core Questions:**

The following core questions apply to all of the MTW Waivers and associated activities listed in the MTW Operations Notice. The core questions collect basic information about any MTW activity proposed or implemented by MTW agencies.

- Narrative. 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.
- MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?
- Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.
- Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?
- Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?
- Family Types. Does the MTW activity apply to all family types or only to selected family types?

- Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.
- Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?
- Does this MTW activity require a hardship policy?
- Does the MTW activity require an impact analysis?

#### **Custom Questions:**

Custom questions are tailored to each MTW activity. In what follows, the MTW activities are listed with their custom questions. The final online version of the MTW Supplement will be set up so that if an MTW activity is the same in the HCV and/or public housing programs, the MTW agency fills in the information for public housing, then the information is auto populated for the HCV program. MTW agencies are asked to fill in answers only to questions that are relevant to the MTW activities they propose to implement or are already implementing.

The Housing Authority of the City of Alameda (AHA) has previously submitted and been approved for the activities marked as "Currently Implementing".

1. Tenant Rent Policies	
b. Tiered Rent (HCV)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
<ul> <li>h. Total Tenant Payment as a Percentage of</li> </ul>	Not Currently Implemented
Gross Income (HCV)	
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
I. Fixed Subsidy (HCV)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
q. Impute Income (HCV)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
u. Elimination of Deductions (HCV)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions	Currently Implementing
(HCV)	

2. Payment Standards and Rent Reasonableness	
a. Payment Standards – Small Area Fair Market	Not Currently Implemented
Rents (FMR) (HCV)	
b. Payment Standards – Fair Market Rents	Currently Implementing
(HCV)	
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented

2. Payment Standards and Rent Reasonableness	
d. Rent Reasonableness – Third Party	Not Currently Implemented
Requirement	

3. Reexaminations	
<ul> <li>Alternative Reexamination Schedule for Households (HCV)</li> </ul>	Currently Implementing
d. Self-certification of Assets (HCV)	Currently Implementing

4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-Based	Currently Implementing
Assistance)	
b. Damage Claims (HCV-Tenant-Based	Not Currently Implemented
Assistance)	
c. Other Landlord Incentives (HCV-Tenant-	Currently Implementing
Based Assistance)	

5. Ho	using Quality Standards (HQS)	
a.	Pre-Qualifying Unit Inspections (HCV)	Currently Implementing
b.	Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
C.	Third-Party Requirement (HCV)	Not Currently Implemented
d.	Alternative Inspection Schedule (HCV)	Currently Implementing

6. Short-Term Assistance	
b. Short-Term Assistance (HCV)	Not Currently Implemented

7. Term-Limited Assistance	
b. Term-Limited Assistance (HCV)	Not Currently Implemented

8. Increase Elderly Age (PH & HCV)	
a. Increase Elderly Age (HCV)	Not Currently Implemented

9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Currently Implementing
<ul> <li>b. Increase PBV Project Cap (HCV)</li> </ul>	Currently Implementing
c. Elimination of PBV Selection Process for PHA-	Currently Implementing
Owned Projects without Improvement,	
Development, or Replacement (HCV)	
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented

9. Project-Based Voucher Program Flexibilities	
e. Alternative PBV Unit Types (Shared Housing	Not Currently Implemented
and Manufactured Housing) (HCV)	
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented

10. Family Self-Sufficiency Program with MTW Flexibility	
a. HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented
c. HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
<ul> <li>d. HCV Modify or Eliminate the Contract of Participation (HCV)</li> </ul>	Not Currently Implemented
e. HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented

11. MTW Self-Sufficiency Program	
a. HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
<ul> <li>b. HCV Policies for Addressing Increases in Family Income (HCV)</li> </ul>	Not Currently Implemented

12. Work Requirement	
b. Work Requirement (HCV)	Not Currently Implemented

13. Use of Public Housing as an Incentive for	Not applicable
Economic Progress (PH)	

14. Moving On Policy	
<ul> <li>a. Waive Initial HQS Inspection Requirement (HCV)</li> </ul>	Not Currently Implemented
<ul> <li>b. HCV Allow Income Calculations from Partner Agencies (HCV)</li> </ul>	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) Not applicable

# 16. Deconcentration of Poverty in Public Housing<br/>Policy (PH)Not applicable

17. Lo	ocal, Non-Traditional Activities	
a.	Rental Subsidy Program	Not Currently Implemented
b.	Service Provision	Not Currently Implemented
C.	Housing Development Programs	Currently Implementing

Core and Custom Question Answers for Activities Plan to Implement in Submission Year or Currently Implemented:

1.w. Alternative Income Inclusions/Exclusions (HCV)

Currently Implementing

ACTIVITY 2022-15: The AHA excludes the Guaranteed Basic Income Pilot Program, which is a City of Alameda initiative to provide a flat monthly cash payment of \$1,000 to approximately 150 low-income City of Alameda households over a two-year period called Rise Up Alameda. The AHA excludes these payments from the income review and rent calculation process of applicants or participants receiving these payments.

The AHA will also exclude income from United Way Bay Area's (UWBA) Community-Based Roads to Prosperity program which is a privately funded guaranteed basic income (GBI) pilot program in Alameda County, California. Starting in late 2024, 100 families will be randomly selected from SparkPoint Centers based in Oakland, Fremont, and Hayward and provided \$18,000 in unconditional cash transfers over the course of 18 months.

This MTW activity serves the following statutory objectives:

 $\Box$ Cost effectiveness

⊠ Self-sufficiency

□Housing Choice

This MTW activity has the following cost implications:

□Neutral

□Increased revenue

Decreased revenue

⊠ Increased expenditures

□ Decreased expenditures

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

⊠to all assisted households

 $\Box$  only to a subset or subsets of assisted households

What inclusions or exclusions will be eliminated, modified, or added?

#### 1.w. Alternative Income Inclusions/Exclusions (HCV)

Guaranteed Basic Income Pilot Program - City of Alameda called Rise Up Alameda and United Way Bay Area's (UWBA) Community-Based Roads to Prosperity program This MTW activity does not require a Safe Harbor Waiver.

This MTW activity does not require a hardship policy.

This MTW activity does not require an impact analysis.

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 AHA implemented this activity on July 1, 2023 and payments for the Guaranteed Basic Income Pilot Program were distributed starting in October 2023. Of the 150 households that are a part of this pilot program, 44% or 67 participants receive rental assistance through the voucher program.

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

Currently Implementing

ACTIVITY 2022-01: The Housing Authority of the City of Alameda strives to house families in a small community in the Bay Area. The area is perceived to be one with good schools, high quality local businesses, picturesque neighborhoods, and a caring, involved community resulting in families wanting to rent or buy in the area resulting in high housing costs and limited housing choice. Payment standards set between 80% to 150% of FMR will hopefully allow the market to cap rents through rent reasonableness testing and not the payment standards.

If the payment standard amount is increased during the term of the HAP contract, the increased payment standard amount shall be used to calculate the monthly housing assistance payment for the family at the interim or regular reexamination, whichever comes first.

The Alameda Housing Authority is has Waived: 24 CFR 982.505 (c) (4), which falls under 2.b. MTW waiver, 2.b. Payment Standards – Fair Market Rents (HCV). CFR982.503-505 and 983.301. This request will allow owners to request rent increases during the HAP contract and the payment standard to be updated to the current one if higher than the one used at the last annual.

Custom Question: Please explain the payment standards by FMR.

The agency may apply a payment standard between 80% and 150% of FMR.

This MTW activity serves the following statutory objectives:

□Cost effectiveness

□ Self-sufficiency

⊠Housing Choice

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

Currently Implementing

This MTW activity has the following cost implications:

□Neutral

□Increased revenue

□ Decreased revenue

 $\boxtimes$ Increased expenditures

□ Decreased expenditures

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

⊠to all assisted households

□only to a subset or subsets of assisted households

This MTW activity does require a Safe Harbor Waiver.

This MTW activity does require a hardship policy.

Hardship policy will be uploaded here, but please see Payment Standards Outside FMR Hardship Policy.

The hardship policy does not apply to more than this MTW activity.

The MTW agency has not modified the hardship policy since the last submission of the MTW Supplement.

How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?

0 hardship requests received during the most recently completed PHA fiscal year.

This MTW activity does require an impact analysis. Impact analysis will be uploaded here, but please see Payment Standard Impact Analysis.

The impact analysis does not apply to more than this MTW activity.

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 AHA implemented this activity on July 1, 2023 and since then the AHA went through the significant amendment process to allow increases in payment standards to be applied at the interim or regular reexamination, whichever comes first. In the most recently completed fiscal year (July 1, 2023 to June 30, 2024) the AHA kept payment standards at 120% of FMR.

This activity has not been discontinued and is not planned to be discontinued.

#### 3.b. Alternative Reexamination Schedule for Households

Currently Implementing

ACTIVITY 2022-02: The AHA has switched to a triennial reexamination schedule for all households except families receiving zero income or less than \$5,000 per adult annually in income, VASH, SV or EHV participants who will receive annual recertifications. AHA will check for families meeting the zero income conditions twice a year (normally January and July) and schedule an annual reexamination as appropriate.

Households are only allowed 1 interim reexamination every calendar year for an income decrease of more than 10% or an income increase of more than 10% from the reexamination or interim, whichever was conducted last.

Cumulative increases between regular reexaminations resulting in more than a 10% income increase need to be reported when the 10% level is reached.

If the payment standard increases when an interim is conducted, the AHA will use the new payment standard to be effective at the interim effective date as allowed under HOTMA.

Custom Question: What is the recertification schedule?

 $\Box$ Once every two years

⊠Once every three years

□Other

Custom Question: How many interim recertifications per year may a household request?

 $\Box 0$ 

⊠1

□2 or more

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

The AHA is limiting households to one interim per calendar year if the household gross income has decreased by 10% or more or if the household gross income has increased by 10% or more.

If a household would like to receive an interim for an income decrease of less than 10% or has already received an interim in the calendar year for one of the two reasons above and would like a second interim, the household may submit a hardship request if:

- The household's income decreases to \$0;
- The decrease is anticipated to be longer than 30 days without a secondary source of income anticipated to increase. For example, families who lose wage income can anticipate a payment of unemployment, so the decrease would not be processed until the unemployment process is completed; OR.
- The household faces eviction

3.b. Alternative Reexamination Schedule for Households
This MTW activity serves the following statutory objectives:
⊠Cost effectiveness
⊠Self-sufficiency
Housing Choice
This MTW activity has the following cost implications:
□Increased revenue
Decreased revenue
⊠Increased expenditures
Decreased expenditures
A MTW activity may apply to all assisted households or only to a subset or subsets of
assisted households by having a different policy by household status/family
types/sites. This MTW activity applies:
□to all assisted households
⊠only to a subset or subsets of assisted households
Does not apply to VASH, SV, or EHV participants.
This MTW activity does not require a Safe Harbor Waiver.
This MTW activity does require a hardship policy Alternative Reexamination Schedule
Hardship Policy.
The hardship policy does not apply to more than this MTW activity.
The MTW agency has not modified the hardship policy since the last submission of the MTW Supplement.
How many hardship requests have been received associated with this activity in the
most recently completed PHA fiscal year?
1 hardship request was received during the most recently completed PHA fiscal year
(July 1, 2023 to June 30, 2024). The request was approved and the interim was
processed.
This MTW activity does require an impact analysis. Impact analysis will be uploaded here, but please see Alternative Reexamination Schedule Impact Analysis.
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 AHA implemented this activity on July 1, 2023. Since then, the AHA has been
working to spread out reexaminations across the 3-year reexamination cycle and

working to spread out reexaminations across the 3-year reexamination cycle and plans to have this fully in place starting in the 2025 calendar year. This activity has not been discontinued and is not planned to be discontinued.

#### 3.d. Self-Certification of Assets

**Currently Implementing** 

ACTIVITY 2022-03: Allow self-certification of up to \$50,000 in assets for participants to reduce processing of minimal income from assets. Family must provide self-certification statement disclosing any income earned on the assets under penalty of perjury. No other verification will be collected or required. Assets are defined in 24 CFR 5.609. Assets that the family does not have access to such as irrevocable trusts and 401K accounts would not count towards this asset limit. Applicants must establish assets and provide verification of all assets regardless of amount.

New assets under \$50,000 do not need to be reported between triennials for participants.

Custom Question: Please state the dollar threshold for the self-certification of assets. Threshold: \$50,000.

This MTW activity serves the following statutory objectives:

⊠Cost effectiveness

□ Self-sufficiency

□Housing Choice

This MTW activity has the following cost implications:

□Neutral

□Increased revenue

Decreased revenue

□ Increased expenditures

 $\boxtimes$  Decreased expenditures

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

 $\boxtimes$  to all assisted households

□only to a subset or subsets of assisted households

This MTW activity does not require a Safe Harbor Waiver.

This MTW activity does not require a hardship policy.

This MTW activity does not require an impact analysis.

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 AHA implemented this activity on July 1, 2023, and since then staff has accepted self-certifications of assets less than \$50,000 where there is no income earned for participants. Staff will no longer be collecting verification on assets under \$50,000 for participants.

This activity has not been discontinued and is not planned to be discontinued.

#### 4.a. Vacancy Loss

Currently Implementing

ACTIVITY 2022-04: This activity is to incentivize landlords to participate in the HCV program in combination with activities 2022-05, 2022-06, 2022-07, and 2022-11.

As these activities are implemented to increase landlord participation in the program, units that are required to house voucher holders such as Project-Based Voucher units, ones with a regulatory agreement on the units, Tax Credit units, or ones owned by the Housing Authority are not included in this activity.

This allows the AHA to make a payment up to one month's rent payment to any landlord, new or returning, whose unit was vacated by a participant of the Housing Choice Voucher program and is occupied by a different participant of the Housing Choice Voucher program. The payment would be capped at the reasonable rent to the owner minus any payments the owner received that month from any source. The payment would be made after the execution of the HAP contract.

Custom Question: Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in low-poverty neighborhood, or units/landlords new to the HCV program?

 $\boxtimes$  Certain types of units only

If certain types of units only, what types of units does this policy apply to?

Units in particular types of areas or neighborhoods

Units/landlords new to the HCV program

 $\boxtimes$  Other. Please describe briefly:

Does not apply to PHA owned, LIHTC units, PBV units, or units with regulatory agreements.

Custom Question: What is the maximum payment that can be made to a landlord under this policy?

One month rent

Custom Question: How many payments were issued under this policy in the most recently completed PHA fiscal year?

0

Custom Question: What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?

\$0

This MTW activity serves the following statutory objectives:

4.a. Vacancy Loss

□Cost effectiveness

□ Self-sufficiency

⊠Housing Choice

This MTW activity has the following cost implications:

□Neutral

□Increased revenue

□ Decreased revenue

 $\boxtimes$ Increased expenditures

□ Decreased expenditures

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

□ to all assisted households

 $\boxtimes$  only to a subset or subsets of assisted households

A MTW activity can apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households. This MTW activity applies to:

□New admissions (i.e., applicants) only

Currently assisted households only

New admissions and currently assisted households

A MTW activity can apply to all family types or only selected family types. This MTW activity applies to:

⊠all family types

□only to selected family types

An MTW activity can apply to a tenant-based and or project-based voucher.

The MTW activity applies to all tenant-based units.

The MTW activity applies to all properties with project-based vouchers.

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

properties with project-based vouchers that will participate in this MTW activity is:

It does not apply to PHA owned, LIHTC units, units with regulatory agreements, or Project-Based Voucher units

This MTW activity does not require a Safe Harbor Waiver.

This MTW activity does not require a hardship policy.

This MTW activity does not require an impact analysis.

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.

#### 4.a. Vacancy Loss

The AHA implemented this activity on July 1, 2023 but has not made any payments under this policy in the last fiscal year.

This activity has not been discontinued and is not planned to be discontinued.

#### 4.c. Other Landlord Incentives

Currently Implementing

ACTIVITY 2022-05: This activity to incentivize landlords to participate in the HCV program in combination with activities 2022-04, 2022-06, 2022-07, and 2022-11.

As these activities are implemented to increase landlord participation in the program, units that are required to house voucher holders such as Project-Based Voucher units, ones with a regulatory agreement on the units, Tax Credit units, or ones owned by the Housing Authority are not included in this activity.

This activity allows the AHA to pay the landlord an incentive to lease up a Housing Choice Voucher (HCV) program participant. The AHA would offer an array of incentives, but the total incentive paid to one landlord could not exceed more than one month of the contract rent of the unit and would be paid at the time of HAP execution.

The incentives are:

First-time Rental incentive: \$1,500 Accessible unit incentive: \$2,000 HQS incentive: \$100 Returning Landlord incentive: \$1,000

A first-time rental incentive would be paid to a landlord that is bringing a unit that has never been leased with the same landlord under the HCV program before. The accessible unit incentive would be paid to landlords providing a unit that meets or mostly meets the requirements for an ADA accessible unit to a family with a member with a disability. The HQS incentive would be paid to landlords whose unit passed an initial housing quality standards inspection the first time and resulted in a participant of the HCV program renting the unit. The returning landlord incentive would be paid to a landlord leasing a unit to an HCV participant that has been on the program prior.

Only one incentive will be given to a landlord, for the same participant in cases where the participant is transferring to a unit within the same complex within one year of occupancy at the original unit.

For individuals who are leasing in place, an incentive will only be provided if the individual was not previously a voucher holder.

#### 4.c. Other Landlord Incentives

Custom Question: Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in low-poverty neighborhood, or units/landlords new to the HCV program?

□To all units

 $\boxtimes$  Certain types of units only

If certain types of units only, what types of units does this policy apply to?  $\boxtimes$  Accessible units

Units in particular types of areas or neighborhoods

⊠Units/landlords new to the HCV program

 $\boxtimes$  Other. Please describe briefly:

Does not apply to PHA owned, LIHTC units, units with regulatory agreements, or Project-Based Voucher units.

Custom Question: What is the maximum payment that can be made to a landlord under this policy?

One month rent

Custom Question: How many payments were issued under this policy in the most recently completed PHA fiscal year?

Between July 1, 2023 and June 30, 2024, 117 payments were issued under this policy – 61 for the HQS incentive, 44 for the returning landlord incentive, 73 for the first-time rental incentive and 0 for the accessible unit incentive.

Custom Question: What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?

Between July 1, 2023 and June 30, 2024, \$159,600 was paid out under this policy – \$6,100 for the HQS incentive, \$44,000 for the returning landlord incentive, \$109,500 for the first-time rental incentive and \$0 for the accessible unit incentive.

This MTW activity serves the following statutory objectives:

□Cost effectiveness

□ Self-sufficiency

⊠Housing Choice

This MTW activity has the following cost implications:

□Neutral

□Increased revenue

Decreased revenue

⊠Increased expenditures

□ Decreased expenditures

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

to all assisted households

 $\boxtimes$  only to a subset or subsets of assisted households

#### 4.c. Other Landlord Incentives

A MTW activity can apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households. This MTW activity applies to:

□New admissions (i.e., applicants) only

Currently assisted households only

New admissions and currently assisted households

A MTW activity can apply to all family types or only selected family types. This MTW activity applies to:

⊠all family types

 $\Box$  only to selected family types

An MTW activity can apply to a tenant-based and or project-based voucher. ⊠The MTW activity applies to all tenant-based units.

The MTW activity applies to all properties with project-based vouchers.

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers. The description of which tenant-based units and/or properties with project-based vouchers that will participate in this MTW activity is:

Does not apply to PHA owned, LIHTC units, units with regulatory agreements, or Project-Based Voucher units.

This MTW activity does not require a Safe Harbor Waiver.

This MTW activity does not require a hardship policy.

This MTW activity does not require an impact analysis.

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 AHA implemented this activity on July 1, 2023 and has not made any changes to the policy. As a result of this activity, the AHA has had more landlords who have shown an interest in leasing to housing program participants and has had 41 more landlords who have housed program participants.

This activity has not been discontinued and is not planned to be discontinued.

#### 5.a. Pre-Qualifying Unit Inspections

**Currently Implementing** 

ACTIVITY 2022-06: This activity to incentivize landlords to participate in the HCV program in combination with activities 2022-04, 2022-05, 2022-07, and 2022-11.

Initial inspections of units can be conducted up to 90 days prior to unit lease-up to help incentivize landlords to participate in the program and avoid delays in leasing. Participants or landlords can request a special (interim) inspection at any time.

Custom Question: How long is the pre-inspection valid for?

90 days

This MTW activity serves the following statutory objectives:

 $\Box$ Cost effectiveness

□Self-sufficiency

⊠Housing Choice

This MTW activity has the following cost implications:

⊠Neutral

□Increased revenue

□ Decreased revenue

□Increased expenditures

□ Decreased expenditures

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

⊠to all assisted households

Only to a subset or subsets of assisted households

This MTW activity does not require a Safe Harbor Waiver.

This MTW activity does not require a hardship policy.

This MTW activity does not require an impact analysis.

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 AHA implemented this activity on July 1, 2023 and has not made any changes to the policy. Between July 1, 2023 and June 30, 2024, 35 pre-qualifying inspections were conducted.

This activity has not been discontinued and is not planned to be discontinued.

#### 5.d. Alternative Inspection Schedule

Currently Implementing

ACTIVITY 2022-07: This activity to incentivize landlords to participate in the HCV program in combination with activities 2022-04, 2022-05, 2022-06, and 2022-11.

Require inspections only once every three years for private landlord units. Participants and landlords can request a special (interim) inspection at any time. A special inspection can be initiated by the AHA if it receives indications that the family's unit is not in compliance with HQS.

Inspections will be scheduled based on risk after July 1, 2025. The activity is being changed so all inspections will be based on the results of the prior inspection. If the unit passes the regular inspection the first time and does not require a reinspection, the next regular inspection will be scheduled for approximately three years later. Otherwise, if the unit does not pass the inspection the first time and requires a reinspection, the next regular inspection will be scheduled in approximately 12 months.

This MTW activity serves the following statutory objectives:

⊠Cost effectiveness

□Self-sufficiency

⊠Housing Choice

This MTW activity has the following cost implications:

□Neutral

□Increased revenue

Decreased revenue

□Increased expenditures

⊠ Decreased expenditures

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

to all assisted households

Sonly to a subset or subsets of assisted households

A MTW activity can apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households. This MTW activity applies to:

□New admissions (i.e., applicants) only

Currently assisted households only

New admissions and currently assisted households

A MTW activity can apply to all family types or only selected family types. This MTW activity applies to:

⊠all family types

 $\Box$  only to selected family types

#### 5.d. Alternative Inspection Schedule

An MTW activity can apply to a tenant-based and or project-based voucher.  $\boxtimes$  The MTW activity applies to all tenant-based units.

The MTW activity applies to all properties with project-based vouchers.

□ The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers. The description of which tenant-based units and/or properties with project-based vouchers that will participate in this MTW activity is:

This MTW activity does not require a Safe Harbor Waiver.

This MTW activity does not require a hardship policy.

This MTW activity does not require an impact analysis. 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 AHA implemented this activity on July 1, 2023.

This activity has not been discontinued and is not planned to be discontinued.

#### 9.a. Increase PBV Cap

Currently Implementing

ACTIVITY 2022-08: Assisted families in the Housing Choice Voucher program frequently inquire how to move to Project-Based Voucher (PBV) units and during the last wait list opening, numerous HCV families applied for the PBV wait lists indicating a desire to have a long-term contract with owners rather than a 1-year contract that can then be canceled with no reason. By project-basing more vouchers, more housing is secured for families without the threat of eviction.

This activity would raise the cap for which the AHA could award Project-Based Voucher contracts. The AHA currently has selections and/or HAP contracts for its entire allocation of PBV under the current caps.

Custom Question: What percentage of total authorized HCV units will be authorized for project-basing?

50% of the lower of either the total authorized units or annual budget authority

This MTW activity serves the following statutory objectives:

□Cost effectiveness

□Self-sufficiency

⊠Housing Choice

This MTW activity has the following cost implications:

⊠Neutral

□Increased revenue

□ Decreased revenue

□Increased expenditures

Decreased expenditures

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

⊠to all assisted households

Only to a subset or subsets of assisted households

This MTW activity does not require a Safe Harbor Waiver.

This MTW activity does not require a hardship policy.

This MTW activity does not require an impact analysis.

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 activity is approved, but the AHA is still below the HUD PBV cap at this time. This activity has not been discontinued and is not planned to be discontinued.

#### 9.b. Increase PBV Project Cap

Currently Implementing

ACTIVITY 2022-09: Allows more than the greater of 25 units or 25% of the units at a complex to receive Project-Based Voucher assistance. Under current regulations, units that are for the elderly or those providing supportive services are already exempt from this cap. This activity would allow units that may not be serving the above populations to go above the cap up to 100% of the units at a project.

This MTW activity serves the following statutory objectives:

□Cost effectiveness

□Self-sufficiency

⊠Housing Choice

This MTW activity has the following cost implications:

⊠Neutral

□Increased revenue

Decreased revenue

□Increased expenditures

□ Decreased expenditures

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

 $\boxtimes$  to all assisted households

□only to a subset or subsets of assisted households

This MTW activity does not require a Safe Harbor Waiver.

This MTW activity does not require a hardship policy.

This MTW activity does not require an impact analysis.

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 activity is approved, but a HAP contract has not been signed using this activity. This activity has not been discontinued and is not planned to be discontinued.

9.c. Elimination of PBV Selection Process for PHA-owned Projects without	
Improvement, Development, or Replacement	
Currently Implementing	
ACTIVITY 2022 040. This activity allows the ALIA to sword preject based you show	

ACTIVITY 2022-010: This activity allows the AHA to award project-based voucher units to a property owned by a single-asset entity (S.A.E.) of the AHA without engaging in a selection process. This would allow the AHA to award vouchers without the RFP to units in the AHA's portfolio that qualify for PBV after conducting a Subsidy Layering Review, ensuring the property is compliant with HUD's site selection requirements, and having a 3<sup>rd</sup> party conduct HQS inspections of the units.

This MTW activity serves the following statutory objectives:

⊠Cost effectiveness

□ Self-sufficiency

□Housing Choice

This MTW activity has the following cost implications:

□Neutral

□Increased revenue

□ Decreased revenue

□Increased expenditures

 $\boxtimes$  Decreased expenditures

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

to all assisted households

Sonly to a subset or subsets of assisted households

A MTW activity can apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households. This MTW activity applies to:

□New admissions (i.e., applicants) only

Currently assisted households only

New admissions and currently assisted households

A MTW activity can apply to all family types or only selected family types. This MTW activity applies to:

 $\boxtimes$  all family types

□ only to selected family types

 $\Box$  Other – another specifically defined target population or populations. The description of this population is:

An MTW activity can apply to a tenant-based and or project-based voucher.

The MTW activity applies to all properties with project-based vouchers.

⊠The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers. The description of which tenant-based units and/or properties with project-based vouchers that will participate in this MTW activity is:

# 9.c. Elimination of PBV Selection Process for PHA-owned Projects without Improvement, Development, or Replacement

Applies only to units owned by a single-asset entity of the PHA.

This MTW activity does not require a Safe Harbor Waiver.

This MTW activity does not require a hardship policy.

This MTW activity does not require an impact analysis.

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 activity has been approved, but an award has not been made at this time. This activity has not been discontinued and is not planned to be discontinued.

#### **17.c. Housing Development Programs**

**Currently Implementing** 

The Housing Authority of the City of Alameda (AHA) intends to use MTW fungibility to acquire, renovate and/or build affordable units that are not public housing units. Eligible activities may include gap financing or construction costs for development of affordable housing, conducted by the PHA or a PHA-controlled affiliate or by a non-PHA affordable housing developer, including but not limited to development of project-based voucher units, tax credit units, or affordable units funded with any other local, state, or federal funds.

The AHA will not spend more than 10% of its HAP budget on local, non-traditional activities and families receiving housing or services through local, non-traditional activities must meet the definition of low-income. Local, non-traditional development activities will be conducted in accordance with the applicable requirements of PIH Notice 2011-45 and the MTW Operations Notice. The Agency shall comply with Safe Harbor provisions requiring compliance with Section 30 of the 1937 Housing Act and that any MTW Funding awarded to a third-party provider must be competitively awarded.

At this time AHA would like to provide up to \$1 million of its funding, which would be about 3% of the AHA's HAP Budget, as gap financing to build affordable units for low-income individuals in the City of Alameda.

Custom Questions	
Name and Address of Development	North Housing Master Plan -
	501 Mosely Avenue,
	Alameda, CA 94501
MTW Role: Acquisition, Rehabilitation, New	New Construction
Construction?	
Type of MTW Agency Financing: Gap Financing, Tax	Mid-term predevelopment
Credit Partnership, Other	financing (up to 15 years)

17.c. Housing Development Programs	
Number of Affordable Units	A minimum of 284 units. There are a minimum of 568 units planned. We hope more affordability can be achieved, but that is still being determined.
Number of Units by Affordability	
• 80% of AMI	Minimum of 132 at or below 80% AMI. We hope more affordability can be achieved, but that is still being determined.
• 60% of AMI	0 units
• 30% of AMI	127 units
• Other	25 units at 40% AMI and 106 units will serve formerly homeless populations.
This MTW activity serves the following statutory objectives:	
□Cost effectiveness	
⊠Housing Choice	
This MTW activity has the following cost implications:	
□Increased revenue	
Decreased revenue	
⊠Increased expenditures	
Decreased expenditures	
A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies: □ to all assisted households ⊠ only to a subset or subsets of assisted households	
<ul> <li>A MTW activity can apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households. This MTW activity applies to:</li> <li>⊠New admissions (i.e., applicants) only</li> <li>□Currently assisted households only</li> <li>□New admissions and currently assisted households</li> <li>A MTW activity can apply to all family types or only selected family types. This MTW</li> </ul>	
activity applies to:	
⊠all family types	

#### 17.c. Housing Development Programs

 $\Box$  only to selected family types

Please select the family types subject to this MTW activity:

□Non-elderly, non-disabled families

 $\Box$ Elderly families

Disabled families (to the extent those families are not exempt via a reasonable accommodation)

 $\Box$  Other – another specifically defined target population or populations. The description of this population is:

An MTW activity can apply to a tenant-based and or project-based voucher.

The MTW activity applies to all tenant-based units.

The MTW activity applies to all properties with project-based vouchers.

⊠The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers. The description of which tenant-based units and/or properties with project-based vouchers that will participate in this MTW activity is: Families selected to reside in the complexes receiving funds.

This MTW activity does not require a Safe Harbor Waiver.

This MTW activity does not require a hardship policy.

This MTW activity does not require an impact analysis.

The impact analysis does not apply to more than this MTW activity.

#### Cohort 4.2 Front-End Vacancy Loss Payment

Currently Implementing

ACTIVITY 2022-11: This activity is to incentivize landlords to participate in the HCV program in combination with activities 2022-04, 2022-05, 2022-06, and 2022-07.

As these activities are implemented to increase landlord participation in the program, units that are required to house voucher holders such as Project-Based Voucher units, ones with a regulatory agreement on the units, Tax Credit units, or ones owned by the Housing Authority are not included in this activity.

Similar to ACTIVITY 2022-04 except this allows the AHA to make a payment up to one month's rent payment to a landlord whose unit was not vacated by a participant of the Housing Choice Voucher program and is subsequently occupied by a participant of the Housing Choice Voucher program. The payment would be made after the execution of the HAP contract.

This MTW activity serves the following statutory objectives:

□Cost effectiveness

□Self-sufficiency

⊠Housing Choice

This MTW activity has the following cost implications:

□Neutral

□Increased revenue

Decreased revenue

⊠Increased expenditures

□ Decreased expenditures

A MTW activity may apply to all assisted households or only to a subset or subsets of assisted households by having a different policy by household status/family types/sites. This MTW activity applies:

□ to all assisted households

Sonly to a subset or subsets of assisted households

A MTW activity can apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households. This MTW activity applies to:

□New admissions (i.e., applicants) only

Currently assisted households only

New admissions and currently assisted households

A MTW activity can apply to all family types or only selected family types. This MTW activity applies to:

⊠all family types

 $\Box$  only to selected family types

An MTW activity can apply to a tenant-based and or project-based voucher.

#### Cohort 4.2 Front-End Vacancy Loss Payment

The MTW activity applies to all tenant-based units.

The MTW activity applies to all properties with project-based vouchers.

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers. The description of which tenant-based units and/or properties with project-based vouchers that will participate in this MTW activity is:

Does not apply to PHA owned, LIHTC units, or units with regulatory agreements. Would not apply to Project-Based Voucher units.

This MTW activity does not require a Safe Harbor Waiver.

This MTW activity does not require a hardship policy.

This MTW activity does not require an impact analysis.

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 AHA implemented this activity on July 1, 2023 but no payments have been made under this policy in the most recently completed fiscal year.

This activity has not been discontinued and is not planned to be discontinued.

# D. SAFE HARBOR WAIVERS

#### D.1. Safe Harbor Waivers seeking HUD Approval:

The MTW Operations Notice describes a simplified process for MTW agencies to implement MTW activities outside of the safe harbors described in Appendix I. For each Safe Harbor Waiver request, a document that includes the following information must be provided: (a) the name and number of the MTW Waiver and associated activity for which the MTW agency is seeking to expand the safe harbor, (b) the specific safe harbor and its implementing regulation, (c) the proposed MTW activity the MTW agency wishes to implement via this Safe Harbor Waiver, (d) a description of the local issue and why such an expansion is needed to implement the MTW activity, (e) an impact analysis, (f) a description of the hardship policy for the MTW activity, if applicable, and (g) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.

Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?

 $\boxtimes No \ \Box Yes$ 

# E. AGENCY SPECIFIC WAIVERS

## E.1. Agency-Specific Waivers for HUD Approval:

The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.

In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.

For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h)a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.

Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?

 $\boxtimes$  No [If no, skip to E.2]  $\square$  Yes [If yes, please provide a title and upload required information in a-h above for each Agency-Specific Waiver request]

## E.2. Agency-Specific Waiver(s) for which HUD Approval has been Received:

For each previously approved Agency-Specific Waiver(s), a set of questions will populate.

Does the MTW agency have any approved Agency-Specific Waivers?

 $\boxtimes$  Yes  $\square$  No [If no, question set concludes]

# F. PUBLIC HOUSING OPERATING SUBSIDY GRANT REPORTING

Not applicable as the Housing Authority of the City of Alameda does not have Public Housing.

## G. MTW STATUTORY REQUIREMENTS

#### G.1. 75% Very Low Income – Local, Non-Traditional.

Not applicable as the Housing Authority of the City of Alameda does not have a local, non-traditional MTW activity.

#### G.2. Establishing Reasonable Rent Policy.

Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?

⊠Yes □No

[If Yes]: please describe the MTW agency's plans for its future rent reform activity and the implementation time line.

The AHA implemented an alternative reexamination schedule (activity 2022-02) which encourages self-sufficiency by allowing families to retain income increases of less than 10% between triennials. This activity was implemented on July 1, 2023, with a threshold of \$10,000 but to be consistent with HOTMA regulations this threshold was revised to 10% which was implemented on August 1, 2024.

Also, activity 2022-15 encourages self-sufficiency by allowing families who were chosen to be a part of the GBI program to retain income increases from the GBI program.

#### G.3. Substantially the Same (STS) – Local, Non-Traditional

Not applicable as the Housing Authority of the City of Alameda does not have a local, non-traditional MTW activity.

#### G.4. Comparable Mix (by Family Size) – Local, Non-Traditional

Not applicable as the Housing Authority of the City of Alameda does not have a local, non-traditional MTW activity.

#### G.5. Housing Quality Standards

Certification is included in MTW Certifications of Compliance for HCV and local, non-traditional program.

## H. PUBLIC COMMENTS

H.1.

Please provide copy of all comments received by the public, Resident Advisory Board, and tenant associations.

The AHA will attach any comments received by the public or Resident Advisory Board.

Please attach a narrative describing the MTW agency's analysis of the comments and any decisions made based on these comments.

Not Applicable.

If applicable, was an additional public hearing held for an Agency-Specific Waiver and/or Safe Harbor waiver? 
Yes 
No

If yes, please attach the comments received along with the MTW agency's description of how comments were considered.

## I. EVALUATIONS

I.1. Please list any ongoing and completed evaluations of the MTW agency's MTW policies, that the PHA is aware of, including the information requested in the table below.

Does the PHA have an agency-sponsored evaluation?  $\Box$  Yes  $\boxtimes$  No

## J. MTW CERTIFICATION OF COMPLIANCE

The MTW agency must execute the MTW Certifications of Compliance form and submit as part of the MTW Supplement submission to HUD.

Please see form HUD-50075-MTW for the certification form that will be executed prior to MTW Supplement submission.