

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 agencies² 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	<p>PHA Name: <u>Pomona Housing Authority</u></p> <p>PHA Code: <u>CA123</u></p> <p>MTW Supplement for PHA Fiscal Year Beginning: (MM/DD/YYYY): <u>07/01/2022</u></p> <p>PHA Program Type: <input type="checkbox"/> Public Housing (PH) only <input checked="" type="checkbox"/> Housing Choice Voucher (HCV) only <input type="checkbox"/> Combined</p> <p>MTW Cohort Number: <u>#1</u></p> <p>MTW Supplement Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Amended Annual Submission</p>
B.	Narrative.
B.1	<p>MTW Supplement Narrative.</p> <p>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.</p> <p>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.</p>

² Legacy MTW Agencies are agencies that were designated as MTW as of December 15, 2015

B. MTW Supplement Narrative.

As an MTW Agency, the Pomona Housing Authority (PHA) will be given the flexibility and authority to develop policies outside the limitations of certain HUD regulations and provisions. This will allow the PHA to achieve its mission and program goals at a higher level by leveraging the unique needs and concerns of the community and residents of Pomona. The PHA is a high performing housing authority that provides safe, decent and affordable housing to hundreds of Pomona residents through special programs serving families, individuals, senior citizens, Veterans, the disabled and homeless households. The PHA's mission is to improve the quality of life for our diverse community. The PHA provides financial assistance through the Housing Choice Voucher and Project-Based Voucher (also collectively known as the Section 8) Programs, and through the Housing and Urban Development Veteran Affairs Supportive Housing, Mainstream, and Foster Youth Initiative Tenant Protection Voucher programs.

The MTW Program will allow the PHA to combine resources permitting the use of HUD funds to better address local program priorities and needs. In addition, the PHA will streamline its business processes to operate more cost effectively and efficiently by implementing innovative business solutions, redesign processes, and amend policies that will reduce administrative complexity, costs and staff time. The PHA plans to consider and assess a range of potential options in subsequent phases of MTW, with a goal of structuring its programs in ways that will assist families achieve financial self-sufficiency over time. The following strategies will help improve the quality of lives of program participants: work in partnership with local community organizations to develop a comprehensive approach to ending homelessness and promote self-sufficiency and assist in the implementation of the City of Pomona's "A Way Home: Community Solutions for Pomona's Homeless Strategic Plan" by creating a program to assist the homeless and chronically homeless achieve self-sufficiency. The PHA proposes to explore its means of assisting these families to access and maintain permanent housing through further coordination with agencies who provide supportive services and expand the success of providing Landlord incentives.

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

1. Tenant Rent Policies	
b. Tiered Rent (HCV)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Plan to Implement in the Submission Year
l. Fixed Subsidy (HCV)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Plan to Implement in the Submission Year
o. Initial Rent Burden (HCV)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
u. Standard Deductions (HCV)	Plan to Implement in the Submission Year
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
3. Reexaminations	
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
d. Self-Certification of Assets (HCV)	Plan to Implement in the Submission Year
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Not Currently Implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
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)	
Increase Elderly Age (PH & HCV)	Not Currently Implemented
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Not Currently Implemented
b. Increase PBV Project Cap (HCV)	Not Currently Implemented
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	
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

d.HCV Modify or Eliminate the Contract of Participation (HCV)	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
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
12. Work Requirement	
b. Work Requirement (HCV)	Not Currently Implemented
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
14. Moving on Policy	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	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)	
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented
c. Housing Development Programs	Plan to Implement in the Submission Year

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

1.j. - Alternative Utility Allowance (HCV)
The PHA will establish one streamlined utility allowance for all HCV units based upon bedroom size and types of utilities paid by the participant in the City of Pomona. The goal of this activity is to reduce the administrative burden of calculating multiple utility allowances based on unit type and streamline recertification processing time. The PHA will continue to review its utility allowance schedule each year and revise it if there has been a 10% change from the prior year. The Pomona Housing Authority will be implementing waiver [1j – Alternative Utility Allowance (HCV)] within the safe harbor limits established in the MTW Operations Notice published in the Federal Register on August 28, 2020.
This MTW activity serves the following statutory objectives: Cost effectiveness
This MTW activity serves the following statutory objectives: Neutral (no cost implications)
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
N/A
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pomona MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
Currently, PHA annually reviews and periodically revises a Utility Allowance Schedule which represents the reasonable costs for utilities as part of the tenant’s lease. The utility allowance is based on utility surveys and analysis of the structure type, bedroom size, appliances provided by tenant, and type of appliances (gas/electric). The simplified schedule will be based on the analysis of data collected from the PHA’s existing HCV portfolio including the most common structure and utility types. This new utility allowance schedule will be implemented upon the biennial certification or change of unit. The PHA proposes a simplified schedule to reduce administrative costs and reduce errors associated with the traditional method of applying Utility Allowances. The simplified utility allowance schedule is also anticipated to benefit property owners who will have a more accurate understanding of the total

gross rent to be applied to their properties. This schedule will be applied to the lesser of: the actual size of the unit or the size of the voucher. The PHA will continue to use current market consumption data to determine when adjustments to the simplified schedule are needed (upon change of more than 10% in rates).

1.n. - Utility Reimbursements (HCV)

The PHA will eliminate the utility reimbursement payments in the HCV program. Families will continue to receive a utility allowance but will not receive additional monies if the utility allowance is greater than the total tenant payment. There are currently 21 families receiving utility reimbursements. Eliminating these reimbursements is a cost savings to the PHA of approximately \$13,860 which could assist an additional HCV family from the waiting list and reducing the administrative burdens of lost checks, canceled checks and fraud. The Pomona Housing Authority will be implementing waiver [1n - Utility Reimbursements (HCV)] within the safe harbor limits established in the MTW Operations Notice published in the Federal Register on August 28, 2020.

This MTW activity serves the following statutory objectives:
Cost effectiveness

This MTW activity serves the following statutory objectives:
Increased revenue

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households

N/A

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Pomona MTW agency
Received 0 hardship requests
Approved hardship requests
Denied hardship requests
There is\are hardship requests pending.

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

This activity is not currently going to be implemented. Any information that remains is an artifact of the activity being previously selected for implementation. This display issue will be fixed in a future release.

N/A

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Pomona MTW agency
Received 0 hardship requests
Approved hardship requests
Denied hardship requests
There is\are hardship requests pending.

Following deduction(s) will be eliminated, modified, or added.

1.u. - Standard Deductions (HCV)

The Pomona Housing Authority is proposing a standard deduction for families to simply the rent calculation process, increase cost effectiveness and reduce administrative burdens. The standard deduction will be \$500 for elderly/disabled families and non-elderly families with one or more dependents:

- a child or children under the age of 18;
- disabled member in the household; or, a full-time student in the household

The Pomona Housing Authority will be implementing waiver [1u – Standard Deductions] within the safe harbor limits established in the MTW Operations Notice published in the Federal Register on August 28, 2020.

This MTW activity serves the following statutory objectives:
Cost effectiveness

This MTW activity serves the following statutory objectives:
Increased revenue

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households

N/A
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pomona MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
500 will be the single standard deduction in the Fiscal Year

3.b. - Alternative Reexamination Schedule for Households (HCV)
The PHA will establish a biennial recertification schedule for all HCV families who have at least \$1,200 per year in annual income. Any families reporting less than \$1,200 per year in annual income will remain on an annual recertification cycle. The goal of this activity is to further self-sufficiency of residents and reduce the burden of reporting to the PHA if the family has increase income. The Pomona Housing Authority will be implementing waiver [3b – Alternative Reexamination Schedule for Households (HCV)] within the safe harbor limits established in the MTW Operations Notice published in the Federal Register on August 28, 2020.
This MTW activity serves the following statutory objectives: Self-sufficiency
This MTW activity serves the following statutory objectives: Neutral (no cost implications)
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other). The MTW activity applies only to selected family types
The MTW activity applies to all tenant-based units
N/A
This MTW activity requires a Hardship Policy. The Hardship Policy is attached.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pomona MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This MTW activity requires an Impact Analysis. The Impact Analysis is attached.
Recertification Schedule is Once every two years
Household may request 1 interim recertifications per year.
To increase self-sufficiency of resident and reduce administrative cost at the PHA, the PHA is proposing to implement a biennial recertification schedule for all families. Families will be allowed up to one interim recertification per year if the household gross income has gone down by 10% or more. If a family reports annual income from \$0 to \$1,200, they will remain on an annual recertification cycle until at least \$1,200 in annual income is received.

3.d. - Self-Certification of Assets (HCV)
At recertification, the PHA will allow families to self-certify assets up to \$50,000. The goal of this activity is self-sufficiency. The Pomona Housing Authority will be implementing waiver [3d – Self-Certification of Assets (HCV)] within the safe harbor limits established in the MTW Operations Notice published in the Federal Register on August 28, 2020.
This MTW activity serves the following statutory objectives: Self-sufficiency
This MTW activity serves the following statutory objectives:

Decreased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
N/A
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pomona MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
The dollar threshold for the self-certification of assets is \$50,000.

4.b. - Damage Claims (HCV-Tenant-based Assistance)
To incentivize a landlord's continued participation in the HCV program, the PHA will allow owners to submit a damage claim of up to one month's contract rent (minus any amounts paid in security deposit) for damages to the unit above and beyond normal wear and tear. The damage claim payment will be paid out to a landlord when the next HAP contract is executed between the owner and the PHA. The goal is to encourage landlords to continue to participate in the HCV program. The Pomona Housing Authority will be implementing waiver [4b – Damage Claims (HCV-Tenant-based Assistance)] within the safe harbor limits established in the MTW Operations Notice published in the Federal Register on August 28, 2020.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity serves the following statutory objectives: Increased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
N/A
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pomona MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This policy applies to all units
The types of units policy applies to:
Maximum payment to the landlord is up to one month's contract rent paid as verified on the most recent Form HUD-50058. The participants security deposit must first be used to cover any damages..
0 payments were issued under this policy in the most recently completed PHA fiscal year.
\$0 issued under this policy in the most recently completed PHA fiscal year.

4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)
In order to incentivize participation in the HCV program, the PHA will provide a one-time \$250 signing bonus for each new HAP contract executed in the City of Pomona. The goal is to increase owner participation in the HCV program. The Pomona Housing Authority will be implementing waiver [4c – Other Landlord Incentives (HCV-Tenant-based Assistance)] within the safe harbor limits established in the MTW Operations Notice published in the Federal Register on August 28, 2020.
This MTW activity serves the following statutory objectives: housing choice
This MTW activity serves the following statutory objectives: increased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
N/A

No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pomona MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This policy applies to To all units (Display selected and additional Pop up is complex logic.)
The types of units policy applies to:
Maximum payment to the landlord is \$250.00.
0 payments were issued under this policy y in the most recently completed PHA fiscal year.
\$0 issued under this policy in the most recently completed PHA fiscal year.

17.c. - Housing Development Programs
The PHA intends to use MTW funding to acquire, renovate and/or build affordable units that are not public housing units. Eligible activities may include: Gap financing for non-PHA development of affordable housing, development of project based voucher units or tax credit partnerships. The PHA 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 HUD definition of low-income. This MTW activity will enable the PHA to redevelop additional PHA owned units and increase the amount of affordable housing in the City of Pomona. The Pomona Housing Authority will be implementing waiver [17c - Housing Development Programs] within the safe harbor limits established in the MTW Operations Notice published in the Federal Register on August 28, 2020.
This MTW activity serves the following statutory objectives: housing choice
This MTW activity serves the following statutory objectives: increased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
N/A
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Pomona MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.

Table 17.c.1 - Housing Development Programs that the MTW Agency plans to commit Funds to in Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 60% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
252 E. 4th Street	Rehabilitation	Gap Financing	12	12	12	0	0	0

Housing Development Programs that the MTW Agency plans to spend funds on in the Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 60% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 60% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 60% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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D.	Safe Harbor Waivers.
D.1	Safe Harbor Waivers seeking HUD Approval: No Safe Harbor Waivers are being requested.

E.	Agency-Specific Waiver(s).
E.1	Agency-Specific Waiver(s) 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, Agency-Specific Waivers may be requested. No Agency-Specific Waivers are being requested.
E.2	Agency-Specific Waiver(s) for which HUD Approval has been Received: MTW Agency does not have approved Agency-Specific Waivers

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
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G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
Income Level		Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income		1
49%-30% Area Median Income		1
Below 30% Area Median Income		22
Total Local, Non-Traditional Households		24

*Local, non-traditional income data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

G.2	Establishing Reasonable Rent Policy.
MTW agency established a rent reform policy to encourage employment and self-sufficiency	

G.3	Substantially the Same (STS) – Local, Non-Traditional.
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	10,873 # of unit months
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	0 # of unit months

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

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
	0	0	0	0	0	0	0			0	0		0
Totals	0	0	0	0	0	0	0			0	0		

G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.	
<p>To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix" of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.</p>		
Family Size:	Occupied Number of Local, Non-Traditional units by Household Size	
1 Person	400	
2 Person	213	
3 Person	127	
4 Person	74	
5 Person	72	
6+ Person	53	
Totals	939	

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

I.	Evaluations.	
<p>No known evaluations.</p>		