



3595 South Main Street,
Salt Lake City, UT 84115

www.housingconnect.org

O: 801-284-4400
TDD: 801-284-4407
F: 801-284-4406
Reasonable Accommodations:
801-284-4439

Annual Plan with Moving To Work (MTW) Supplement to Annual PHA Plan Calendar Year 2025 (January 1, 2025 – December 31, 2025)

Approved by HUD: TBD

The following documents comprise Housing Connect's Calendar Year 2025 PHA Annual Plan and MTW Supplement and are included herein:

1. Executive Summary
2. PHA Annual Plan (HUD Form 50075-HP) & Attachments
 - B.1. Revision of PHA Plan Elements
 - B.2. New Activities
 - B.3. Progress Report
 - B.4. Capital Improvements
3. MTW Supplement (HUD Form 50075-MTW)
 - Safe Harbor Waiver Request: Alternative Income Exclusions Impact Analysis
4. Other Documents
 - a) Public Comment & Action
 - b) RAB Comments/Minutes/Approval
 - c) Board Resolution
 - d) Certification by State or Local Official 50077-SL
 - e) Certifications of Compliance 50075 MTW
 - f) Certifications of Compliance 50077 -ST-HCV-HP
 - g) Certification of Compliance 50077 CR

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1. Executive Summary

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Housing Connect's Calendar Year 2025 Annual Plan sets goals and objectives that work towards fulfilling our mission and improving the lives of the people we serve. This comprehensive approach is consistent with plans established by the U.S. Department of Housing and Urban Development (HUD) and local leadership and is in alignment with the Salt Lake County Consolidated Plan.

Agency Overview

The Salt Lake County Commissioners formed the Housing Authority of the County of Salt Lake (doing business as Housing Connect) in 1970. We are a tax-exempt, municipal corporation, governed by a seven-member Board nominated by the Salt Lake County Mayor and confirmed by the County Council. Board members serve a four-year term with an option for a reappointment. Our funding comes primarily from rents we collect, subsidies from the federal government and local government grants.

Housing Connect Board of Commissioners

Spencer Moffat, Chair	The Boyer Company
Phil Bernal, Vice Chair	(ret.) Higher Education Administrator
Kat Johnson	Utah's Promise/United Way of Salt Lake
Wendy Leonelli	J. Fisher Companies
Erin Litvack	Salt Lake County Government
Christine Nguyen	State of Utah
Gwen White	Resident Advisory Board

Housing Connect's annual revenue exceeds \$60 million. Housing Connect staff includes 137 employees, with an average job longevity of 5.2 years.

Our mission is to connect people and communities to quality affordable housing opportunities while promoting self-sufficiency and neighborhood revitalization. The health and wellbeing of our residents and neighborhoods are at the core of our work. Our staff and programs are grounded in these fundamental beliefs and values:

Excellence – We strive to be the best in all areas of our work and a leader in our industry. We seek to continually develop our skills and abilities to provide timely, professional, and quality service. We encourage technical mastery and excellence in the performance of job tasks and in fulfillment of our goals and objectives. We learn from both our successes and failures and continuously strive for improvement.

Integrity – We are honest, fair, and forthright. We are transparent and exhibit strong moral character in our day-to-day operations and decision making. We are respectful and celebrate all people. We aspire to build trust, respond to individual needs, and benefit the community.

Innovation – We are creative problem solvers. We turn ideas into solutions that add value to residents' lives and our community. We embrace change. We are resourceful, collaborative, and act courageously. We build on prior successes. Our innovation will support a brighter future.

Humility – We are open and focused on where we can help. We see dignity in others and seek to build greater community and belonging. We acknowledge our mistakes and limitations. We listen to everyone

associated with our efforts. We believe in the power of choice. We work hard to appreciate and support our residents throughout the evolution of their life circumstances.

Accountability – We are responsible for our words and actions. We take individual ownership and pride in our work and the services we provide. We earn the public's support and confidence for the resources they entrust to our agency. We know that these resources are finite and that our programs and services must be efficient, sustainable, and economically viable.

Inclusion – We are an anti-racist and inclusive organization. We are committed to creating opportunities for traditionally excluded groups to be included, represented, and for their voice to be heard and valued. Housing Connect has a responsibility to address structural oppression in our community through our work in housing. We stand for diversity and empathy without exception. We oppose discrimination in any form.

Housing Connect is an award-winning agency with numerous recognitions from the National Association of Housing and Redevelopment Officials (NAHRO), the U.S. Department of Housing and Urban Development (HUD), and others. Since the inception in 1990 of the performance measurements by HUD's Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP), Housing Connect has received High Performer status for over 26 years and retains High Performer status under the Moving to Work (MTW) umbrella.

Housing Connect was designated as a MTW agency in May 2021 as part of MTW "Cohort #2" which involves a six-year evaluation of alternative rent policies designed to increase resident self-sufficiency and reduce administrative burdens. Housing Connect will also implement other allowable MTW activities above and beyond the alternative rent policies evaluation program.

Housing Connect is committed to MTW's 3 statutory objectives of achieving greater cost effectiveness in federal expenditures, increasing self-sufficiency, and increasing housing choice for low-income families. MTW flexibility will support Housing Connect's mission to connect people and communities to quality affordable housing opportunities while promoting self-sufficiency and neighborhood revitalization.

As a Moving To Work Housing Authority HUD's traditional performance measures (PHAS and SEMAP) are no longer an applicable measurement tool. However, Housing Connect continues to excel with efficient program implementation, effective service delivery and innovation to best serve low-income households in Salt Lake County.

Housing Connect is a service-oriented housing authority that assists low-income individuals, families, elderly, and individuals with physical or mental disabilities. Housing Connect currently owns and operates 184 public housing units serving individuals and families. In addition, Housing Connect has converted 592 public housing units to maintain housing affordability including: 234 units through HUD's Rental Assistance Demonstration (RAD) program and 358 units through disposition. Of the 592 converted units, 489 units remain deeply affordable with project-based vouchers and 103 single family homes were sold at an affordable rate to income-qualified households in the community.

Housing Connect utilizes the Low-Income Housing Tax Credit Program (LIHTC) to maintain and expand affordable units in Salt Lake County. Housing Connect has developed or renovated 900 units using tax credits, the majority of these units serve special needs populations that face many barriers to housing, such as being formerly homeless, older adults with disabilities, and individuals with refugee status.

Through the Section 8 Housing Choice Voucher program, Housing Connect provides rental housing assistance to 3,635 households and 834 additional households through other rental assistance programs for 4,469 households. These programs serve low-income households with additional barriers to housing

including veterans, persons living with HIV/AIDS, elderly and disabled households, persons at risk of or experiencing homelessness, and individuals with refugee status.

Housing Connect has adopted the Social Determinants of Health as a core framework to focus current and future activities, initiatives, and housing development efforts. The agency's six priority determinants are: Housing Stability, Financial Health, Food Quality & Stability, Education Connection, Health Access & Connection, and Community Connection. Collectively, the priority determinants identify the holistic impact Housing Connect seeks to make for those served.

2020-2025 Agency Goals:

- Maintain high performer status with HUD-subsidized housing programs
- Increase Affordable Housing physical units by 350
- Increase Affordable Rental Subsidies by 300 units
- Diversify funding
- Reposition and secure long-term viability of Public Housing properties
- Enhance and grow supportive services that maintain housing assistance and promote well-being

Housing Connect is pleased to be an industry leader and in the elite group of housing authorities in the nation implementing policies that will address local needs and increase cost effectiveness, self-sufficiency, and housing choice.

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2. PHA Annual Plan (HUD Form 50075-HP)

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Streamlined Annual PHA Plan <i>(High Performer PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA’s mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. The Form HUD-50075-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A.	PHA Information.																										
A.1	<div><div>DRAFT</div><div><p>PHA Name: <u>Housing Authority of the County of Salt Lake and Housing Connect</u> PHA Code: <u>003</u></p><p>PHA Type: <input checked="" type="checkbox"/> High Performer</p><p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>January 1, 2025 – December 31, 2025</u></p><p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p><p>Number of Public Housing (PH) Units <u>184</u> Number of Housing Choice Vouchers (HCVs) <u>3243</u></p><p>Total Combined <u>3427</u></p><p>PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p><p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p><p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p><table><tr><th rowspan="2">Participating PHAs</th><th rowspan="2">PHA Code</th><th rowspan="2">Program(s) in the Consortia</th><th rowspan="2">Program(s) not in the Consortia</th><th colspan="2">No. of Units in Each Program</th></tr><tr><th>PH</th><th>HCV</th></tr><tr><td>Lead PHA:</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td></tr></table></div></div>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																	
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		PH	HCV																								
Lead PHA:																											

B.	Plan Elements
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last Annual PHA Plan submission?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element below:</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office Review.</p> <p>See attachment B.1.</p>
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p> <p>See attachment B.2.</p>
B.3	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.</p> <p>See attachment B.3.</p>

B.4.	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>Housing Connect plans to follow the capital improvement plan in the 5-Year Action Plan for 2023-2028 Rev.1 HUD-50075.2 that was approved by HUD on 5/08/2024.</p>
B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
C.	Other Document and/or Certification Requirements.
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
C.2	<p>Certification by State or Local Officials.</p> <p>Form HUD-50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p>Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p><i>Form 50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>
D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	<p>Affirmatively Furthering Fair Housing.</p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <p>Housing Connect fulfills the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. Housing Connect is an anti-racist and inclusive organization. We are committed to creating opportunities for traditionally excluded groups to be included, represented, and for their voice to be heard and valued. Housing Connect has a responsibility to address structural oppression in our community through our work in housing. We stand for diversity and empathy without exception. We oppose discrimination in any form.</p>

	<p>As outlined in HC’s HCV Administrative Plan and PH’s Admissions and Continue Occupancy Policy detailed throughout the policies, all programs operated by HC are operated in a manner that affirmatively furthers fair housing and in compliance with the Fair Housing Act and implementing regulations. Housing programs are nondiscriminatory programs where all participants and applicants are provided the same quality of service, regardless of family characteristics and background. Households with a disability who require additional accommodation to use and enjoy a program or dwelling are provided the opportunity to request a reasonable accommodation. In addition, to ensure that all households can access HC programs regardless of English proficiency, HC implements a comprehensive Limited English Proficiency policy to ensure services and documents are available in the household’s preferred language.</p>
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B.1. Revision of PHA Plan Elements

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Attachment B.1.

Housing Connect Revision of PHA Plan Elements

Needs Statement

INTRODUCTION

The State of Utah, and Salt Lake County in particular, face an affordable housing crisis. From 2010-2020, Utah led the country in population growth due to high birth rates and employment opportunities. This growth generated an increased demand for housing. Housing development has always been limited on the Wasatch Front due to the geographic constraints of the Oquirrh Mountains and Great Salt Lake to the west and the Wasatch Mountains to the east. The growing demand for additional housing coupled with the geographic limitations is causing building costs and home values to increase beyond most households' means.¹

There are over 123,000 renters in Salt Lake County and 64% of those renters are classified as low-income, with income below 80% of Area Median Income.² This population is disproportionately impacted by the housing shortage. This report will explore the compounding factors contributing to the housing crisis in more detail and demonstrate how the Housing Authority of the County of Salt Lake dba Housing Connect plans to address the need for low-income residents of Salt Lake County.

AFFORDABLE HOUSING GAP

The affordable housing gap in Salt Lake County is significant and disproportionately impacts the households with the lowest incomes. This gap is the difference between the number of households in need of housing and the number of units that are affordable and available for rent.³ As a whole, there is nearly sufficient housing for renter households in Salt Lake County. For every 100 households at or below 80% of AMI, there are 95 units available. Those units are not available, however, for households with the lowest incomes in our community. For households below 50% of AMI there is a 47,737-unit deficit. This means that for every 100 households with income below 50% of AMI, there are only 25 affordable units available. For households below 30% of AMI, the situation is even worse, with only 1 of every 100 units qualifying as affordable.⁴ As home prices rise, prospective homebuyers have been priced out of the market and as a result, demand for rental housing has increased substantially. This increase in demand caused rents to increase 10.5% annually between 2020 – 2022, with the highest percentage increases in some of Salt Lake's most affordable housing areas⁵.

The demand for housing has resulted in rapidly increasing housing costs. According to the SLCo Consolidated Plan, 2020, housing prices have risen by 119% since 2000 and gross median rent has increased by 97%. While the cost of housing continues to increase, income has not kept pace.

In addition to the current housing gap, Salt Lake County was growing more rapidly than housing units were being built for 7 years. The community received a positive sign in 2018, when the number of new units began to exceed the number of new households, indicating that we will begin to see the housing

¹ James Wood, Dejan Eskic, D.J. Benway, "What Rapidly Rising Prices Mean for Housing Affordability"(Gardner Business Review,2018) 17-18

² Comprehensive Housing Affordability Strategy (CHAS) data based on 2015-2019 ACS 5-year estimates

³ The US Department of Housing and Urban Development (HUD) considers housing affordable when no more than 30% of the household income is allocated towards rent/mortgage.

⁴ Utah Housing Affordability Dashboard 2022, [Affordable Housing Dashboard - Kem C. Gardner Policy Institute \(utah.edu\)](#)

⁵ Dejan Eskic, "The Changing Dynamics of the Wasatch Front Apartment Market" (Gardner Policy Institute, 2022),

gap closing.⁶ This trend has continued through 2021. In the recent Garner Business Review article, “What Rapidly Rising Prices Mean for Housing Affordability”, James Wood et. al provide a comprehensive summary of the compounding factors that have resulted in fewer units being developed. Because demand for commercial and residential development is high, the cost for labor and supplies has also increased. In addition, the need for skilled laborers has increased as more developments are underway. Although this is a benefit for the workers, it also results in higher per unit costs for developments, restricting the number of units that can be set aside for low-income households. Additionally, land is expensive. Land in high opportunity areas⁷, where poverty rates are low and school performance is high, is even more expensive. Many communities have zoning laws that restrict the use of land to prevent multi-family developments. Developers interested in providing affordable housing are outbid by high end apartment developers or are prevented from building due to NIMBYism (Not in my backyard).

While these compounding factors remain the case, the housing gap will continue to exist. Salt Lake County will continue to face low vacancy rates and an extremely competitive housing market. In fall 2021, rental vacancy rates in Salt Lake County fell below 2%, while 5% is generally considered a balanced market.⁸

NEED FOR AFFORDABLE HOUSING OPTIONS

For the select few low-income households who are fortunate enough to secure a Housing Choice voucher in Salt Lake County, housing is affordable. However, the demand for housing vouchers outpaces the supply. Across the three housing authorities serving Salt Lake County, there are 7,347 Housing Choice vouchers.⁹ Meanwhile, there are over 49,000 renters who would likely qualify for assistance. The Salt Lake Centralized Waiting List for Housing Choice Vouchers used by Housing Connect and the Housing Authority of Salt Lake City was recently open for 3 months, from June 2023 – September 2023. As of April 2024, there are currently 6,960 households waiting for rental assistance. Housing Connect operates 3,635 Housing Choice Vouchers, including Special Purpose Vouchers, and an additional 834 vouchers through federal, state and local partnerships. There is a need for additional rental subsidies to support low-income households, and Housing Connect seeks all opportunities to offer additional Housing Choice and other rental assistance vouchers.

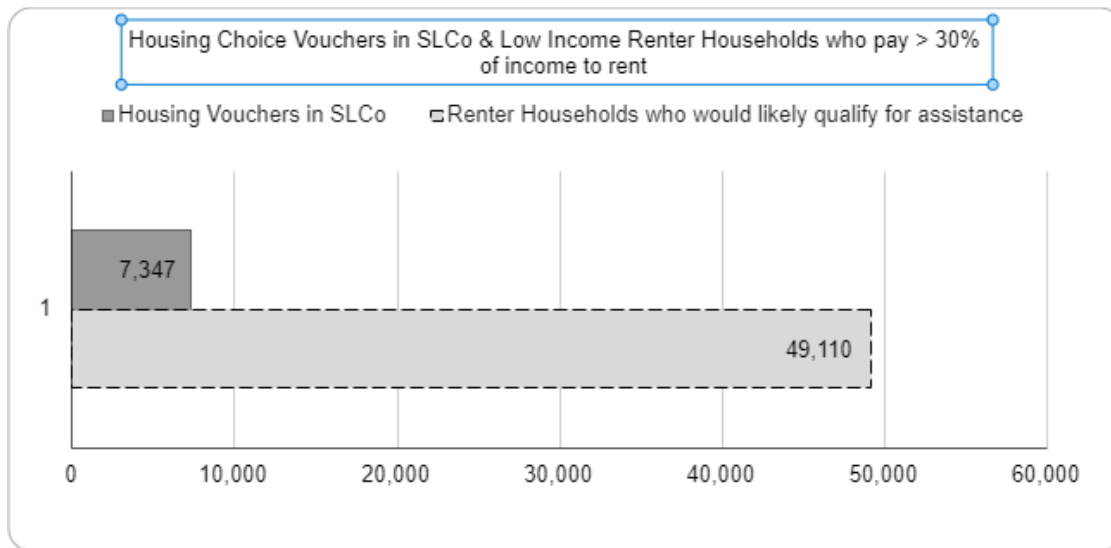
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⁶ Ivory Boyer 2019 Year End Construction report

⁷ US Department of Housing and Urban Development (HUD) has issued several definitions for high opportunity areas. This statement references the FHFA’s Duty to Serve definition which identifies a high opportunity area as either an area designated by HUD as “Difficult Development Area” where development costs are high compared to AMI, or an area designated by the state or local Qualified Allocation Plan as a high opportunity area. To qualify under either definition, poverty rates must fall below 10%.

⁸ James Wood, Dejan Eskic, D.j. Benway, “The State of the State’s Housing Market” (Gardner Policy Institute, 2021), 10

⁹ Including specialty vouchers, HUD Housing Choice Voucher (HCV) Data Dashboard (https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/dashboard, data current as of November 2023) + Emergency Housing Vouchers available as of 4/9/2024 [Emergency Housing Voucher \(EHV\) Data Dashboard | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](#)



Need for Units Designated for Low-Income Households

Even among those who receive a rental subsidy, access to quality, affordable housing is limited by low vacancy rates. Low vacancy rates indicate that when a household is looking for an apartment, there are few to choose from. The landlord has a pool of applicants from which to select their next tenant. When vacancy rates are low, landlords often charge additional fees during the application phase such as application fees, holding fees, and larger deposits. For low-income households, these fees can be significant obstacles that prevent them from applying. Any additional barriers to housing that a household may have such as poor credit, history of eviction, debt owed to landlords, or criminal history, most of which disproportionately impact low-income renters, make securing a home even harder. After being issued a voucher, 21% of households are never able to secure a unit and lease up.

Project Based Vouchers and other structures that allow units to be set aside for low-income households help to secure units for households with the highest barriers to housing. Housing Connect operates 427 Project Based Voucher units set aside through new developments, RAD conversions and community partnerships. Additional sustainable units need to be set aside for households with the highest housing barriers to put affordable housing in reach for all households in our community.

Public Housing

The traditional HUD model of Public Housing is used in communities to address the challenge of finding and securing units. Public Housing was established to provide decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities. Housing Connect operates 184 Public Housing units. Like Housing Choice Vouchers, these units are also in high demand. The waitlist for Public Housing closed on April 4, 2023, and there are 3,848 households on the list.

Public Housing has become increasingly difficult to sustain over the past 20 years. The capital needs to sustain the aging units continue to increase while the resources to maintain them decrease. Using the RAD demonstration program and Section 18, Housing Connect is addressing some of the required present and future capital needs. There is a long-term pattern of underfunding Public Housing, which continues to leave significant capital needs unmet.

The Department of Housing and Urban Development (HUD) recognizes the challenges with sustainability of Public Housing. To address this, HUD has introduced voluntary programs to provide housing authorities with the tools to transition public housing units out of public housing while maintaining the incredibly valuable affordable units within the community. Rental Assistance Demonstration (RAD) is one of those tools. RAD provides housing authorities with access to funding to make needed improvements to

the properties. The RAD program is also a way for housing authorities to convert their public housing units to Housing Choice Voucher contracts so that the rent will continue to be affordable for residents.

VULNERABLE POPULATIONS

Defining the vulnerable populations as they relate to affordable housing can be difficult because the reasons and characteristics of vulnerability are so varied. It is also critical, however, to identify the populations who need to be considered when affordable housing decisions are made. This section will outline those groups that Housing Connect considers when making decisions related to affordable housing.

Low-Income Households

The affordable housing gap disproportionately impacts low-income households. The Housing Gap becomes apparent when households earn less than 50% of Area Median Income (AMI). Therefore, Housing Connect identifies very-low (50% of AMI) and extremely-low (30% of AMI) income households as a vulnerable population.

Area Median Income for a Family of 4		
Area Median Income	50% of AMI	30% of AMI
\$106,000	\$53,000	\$31,800

HUD defines Cost Burden as a household paying more than 30% of gross income to rent/mortgage. If a household is paying over 50% of gross income to rent/mortgage, HUD considers this to be a Severe Cost Burden. Renters earning less than 50% of AMI experience severe cost burden at an alarming rate. In Salt Lake County, a renter earning less than 50% of AMI has a 44% chance of being severely cost burdened. At 30% of AMI, 63% of households pay more than 50% of their income toward rent. The chart below demonstrates the impact of cost burden on a household earning 30% of AMI in Salt Lake County.

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A Family of	With monthly earnings of ¹⁰	Can afford a monthly rent of ¹¹	In Salt Lake County, their apartment will cost ¹²	Cost Burden
1	\$1,858	\$557	Studio - \$1,121	\$564
2	\$2,121	\$636	One Bedroom - \$1,338	\$702
3	\$2,388	\$716	Two Bedroom - \$1,606	\$890
4	\$2,650	\$795	Three Bedroom - \$2,168	\$1,373

Housing Connect targets affordable housing resources toward those most in need in the community. The average annual income of Housing Choice Voucher holders is \$18,200 and the average annual income of Public Housing residents is \$22,536. Of the residents served by Housing Connect 81% have Extremely Low Income, earning less than 30% of AMI. An additional 15% are Very Low Income, with income falling below 50% of AMI.¹³ In addition, Housing Connect considers the Vulnerable Populations outlined in the Salt Lake County Analysis of Impediments when considering changes to affordable housing options.

Homeless Households

Housing Connect supports the U.S. Department of Housing and Urban Development's (HUD) efforts to end homelessness and identifies homeless households as a vulnerable population. In support of HUD's goal to end homelessness, Housing Connect seeks opportunities to end homelessness among specific

¹⁰ FY2023 HUD Income Extremely Low Income Limits Salt Lake County Annual Income divided by 12

¹¹ Monthly Affordable Housing Guideline (30% of Monthly Income)

¹² FY 2024 Salt Lake County Fair Market Rate (FMR)

¹³ HACSL database, April 2024 Data

populations of homeless households including chronically homeless individuals and families, homeless families, youth and children, and homeless veterans. According to the Salt Lake Valley Coalition to End Homelessness' (SLVCEH) 2024 Report on Homelessness, there were 6,683 persons who experienced homelessness in Salt Lake County in HUD FY22. As housing prices continue to rise and the gap of affordable housing units increases, the number of households who are at risk of becoming homeless also continues to increase. Data from HMIS in 2023 demonstrated a 10% increase statewide in individuals who experienced homelessness for the first time.¹⁴ In Salt Lake County, 53% of households who became homeless were experiencing homelessness for the first time.

The Housing Now report published by the SLVCEH identified the need for 2,950 housing units in 2021 and approximately 1,400 more units each year to provide housing for every person experiencing homelessness. The report identified the need for additional permanent supportive housing units, permanently subsidized housing units and deeply affordable housing units among the key solutions. In Salt Lake County, there are currently 2,784 units of permanent supportive housing (PSH). The SLVCEH 2024 Report on Homelessness indicates a gap of 600 units in 2024 plus a need for 280 new units annually to meet the growing need. Unfortunately, the Housing Inventory Count (HIC) only indicates that an additional 452 PSH units were added during a two-year period between 2021-2023.¹⁵ The current rate of growth is not sufficient to meet even the existing need.

Housing among especially vulnerable populations is increasing across the State of Utah. Between 2020-2023, homelessness among seniors and families increased 27% each and homelessness among youth increased 59%. In 2023, there were over 5,000 seniors and over 10,700 persons from families with children experiencing homelessness statewide.¹⁶ The 2023 Point-In-Time Count, conducted nationwide one night in January each year, identified 162 families consisting of 552 individuals, 131 veterans, 380 survivors of domestic violence, 692 adults with substance abuse disorders, 1,027 adults with mental illness, 753 chronically homeless persons and 121 youth between 18-25 years who were experiencing homelessness in Salt Lake County either in shelter or on the streets.

Protected Classes

Housing Connect also identifies three protected classes who have been identified as Vulnerable Populations in the Salt Lake County Analysis of Impediments (2014)¹⁷.

Minority Households

Housing Connect strongly condemns racism and bigotry in every form. As an agency we believe in fairness, equity, and inclusion for every person. It pains us to know that these basic decencies are denied to people because of the color of their skin. We are committed to fighting against racial inequity and injustice in the important housing work that we do.

Salt Lake County is undergoing rapid population expansion and 52% of the population growth between 2010-2020 is driven by minority populations¹⁸. Minority growth in Salt Lake County has been trending upwards since 2000. The growing minority population is disproportionately distributed in lower opportunity areas such as Kearns, Magna, Midvale, Salt Lake City River District, South Salt Lake, Taylorsville, and West Valley Central. These areas hold 35% of the total population, but 58% of the minority population.

The increasingly competitive housing market is more likely to benefit white households and hinder minority households. Only 29.6% of white households in Salt Lake County rent. The high rates of homeownership among white households means this population will benefit from increased home equity as the housing market rises. However, minorities rent at higher rates than whites with 52.4% of minority

¹⁴ 2023 Annual Data Report on Homelessness, State of Utah

¹⁵ 2023 Annual Data Report on Homelessness, State of Utah

¹⁶ Homelessness in Utah, Statewide Response FY23/24 Accomplishments and Funding report by DWS

¹⁷ Statistics included below regarding the vulnerable populations are from the "Salt Lake County: Analysis of Impediments," (2014) unless otherwise cited.

¹⁸ "Fact Sheet: First Insights - 2020 Census Race and Hispanic or Latino Origin in Utah" Kem C Gardner Policy Institute, August 2021

households renting housing units. Among renters, minorities are more likely to experience severe cost burden than whites. Only 19.8% of white renters are severely cost burdened, as compared to 32.4% of minority renters. Therefore, minorities will bear the brunt of rising rental prices as demand outpaces supply and an increasingly competitive rental market squeezes low-income minorities out of high opportunity areas.

Disabled and Elderly

Like many metropolitan areas, Salt Lake County faces an oncoming demographic shift as the baby boomer generation enters retirement. Although Salt Lake City is comprised of a smaller percent of seniors than the national average, 10% seniors compared to 15.6% nationwide,¹⁹ demographic projections show a state-wide increase in the elderly population, incurring a new demand for housing suitable for aging residents.²⁰ The historically low elderly population means that Salt Lake City has a shortage of housing conducive to the latter stages of life, which will be required if elderly population increases as the projections show. The principles of Life Cycle Housing acknowledge that people have different housing needs at different stages of their lives. The lack of housing for an aging population means that many elderly residents will face the difficult decision of either contending with housing that doesn't fit their needs or uprooting themselves from their community to seek out more suitable housing.

One of the most common housing needs among the elderly is a unit conducive to mobility limitations. The required mobility accommodation can range from a unit without stairs to a Type A unit, suitable for a wheelchair. The 2010 census shows that 8% of the Salt Lake County population is disabled; however, seniors experience disabilities at a much higher rate, comprising 37% of all people with a disability. There are an estimated 5,600 renters with ambulatory disabilities in Salt Lake County, contributing to a demand for units specially outfitted to meet Type A accessibility standards for wheelchair access. While the Fair Housing Act standard is sufficient for many renters, there is an additional need for Type A standard units, and the demand far outstrips the supply. It is projected that 1,800 residents of Salt Lake County require a wheelchair, while the supply of units that can accommodate a wheelchair has largely remained stagnant since 2003. Currently, there are about 285 Type A units in Salt Lake County, and their geographic distribution is limited. Half of all Type A units are in Salt Lake City, and the remaining units are concentrated around South Salt Lake, Murray, Midvale, West Valley Central, Taylorsville, and Kerns. The inadequate distribution of Type A units restricts the ability of the elderly to age in place and limits their options for fair housing. Currently, 2,800 disabled residents are severely cost burdened, very low-income, and receiving no rental assistance.

Families with Children and Large Family Sizes

Although familial status is a protected class, discrimination against families looking for rental units is still a major concern. Familial status is the second highest reported class of discrimination in Utah. Harvard economist Raj Chetty found moving to opportunity areas as a young child (under 13) raised lifetime expected income by 30.8%.²¹ Children who moved also experienced higher rates of college attendance and lower rates of single parenthood.²² Affordable housing options and the potential for housing mobility is a critical policy initiative with an unrealized potential to reduce intergenerational poverty nationwide.

In Salt Lake County, large households with five or more family members represent 14% of all rental households. This population is disproportionately renters, and they face unique challenges in securing a rental unit. Additionally, large families with children seek out rental units that are in safe areas with good school districts, meaning that this population has area-specific housing preferences that result in increased competition and higher prices on the open market.

¹⁹ US Census 2010

²⁰ "Growing SLC: A Five Year Housing Plan 2018-2022," (2017), 36

²¹ Raj Chetty, Nathaniel Hendren, and Lawrence F. Katz. "The effects of exposure to better neighborhoods on children: New evidence from the Moving to Opportunity experiment." *American Economic Review* 106, no. 4 (2016): 895.

²² *Ibid.*, 857, 880

The scarcity and competition large households face in securing a housing unit often means that unit availability dictates where the family will live instead of other factors such as quality of life, proximity to work and schools, or neighborhood safety. This is especially true of families with Housing Choice vouchers. The restrictions placed on families requiring 5+ bedroom units are illustrated by the uneven population distribution of large families. Less than 10% of large renter families live in South Jordan, Riverton, Herriman, Bluffdale, and Draper, despite over 15% of the Salt Lake County population residing in these areas. Large renter families are underrepresented in these areas as a product of rental unit scarcity and landlords reluctant to rent to families with lots of children. On the contrary, nearly half of all large family renters live in Salt Lake City, West Valley Central, South Salt Lake, and Taylorsville, while only 38.67% of the county's population resides in these areas. The overrepresentation of large renter families in these areas is a product of how the distribution of rental units restricts the options of large families. Additionally, large families have an increased risk of severe cost burden at 37%, as opposed to 25% of all households. This population faces disproportionate barriers to housing and is more vulnerable to increased market competition.

Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions

Public Housing

Housing Connect's Public Housing Admissions and Continued Occupancy Policy can be found at www.housingconnect.org. The Deconcentration Policy is outlined in Chapter 4. Regarding eligibility, selection, admission, and unit assignment please see chapters 3, 4 & 5.

Tenant selection for Public Housing is based on income, and date and time of the application. The waiting list for Public Housing closed on April 4, 2023. Housing Connect maintains a site-based waiting list for Valley Fair Village, a mixed population public housing development. The waiting list for Valley Fair Village opened effective July 20, 2015 and remains open at this time.

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Local Preferences: No new preferences are proposed for CY2025, current preferences include:

The PHA will verify preference for its mixed population development as well as the following local preferences; Public Housing will offer a preference to families who are seeking to transfer from Housing Connect's Housing Choice Voucher Program, Project Based Voucher Program or other covered housing program operated by the PHA for displacement by:

- Domestic violence, dating violence, sexual assault, stalking or human trafficking under VAWA – to verify qualification for this preference Housing Connect will follow documentation requirements as outlined in the ACOP section 16-VII.D.
- Hate crimes - to verify qualification for this preference Housing Connect will require certification by a law enforcement agency or other reliable information.
- Inaccessibility of a unit and/or to accommodate a disability under a request for reasonable accommodation - to verify qualification for this preference Housing Connect will require certification by a healthcare professional.
- Relocation - a relocation preference will be extended to individuals who reside in units owned by Housing Connect who are subject to relocation for demolition, disposition, or extensive rehab.
- Housing Connect's Board of Commissioners may invoke a preference for families displaced by a Gubernatorial or Presidentially declared disaster under terms and for a duration chosen by the Board when such preference is invoked.

Housing Choice Voucher

Housing Connect's Housing Choice Voucher Administrative Plan can be found at <https://housingconnect.org/wp-content/uploads/2023/03/Admin-Plan-3.2023.pdf> Regarding eligibility, selection and admissions, see Chapters 3, 4 and 5.

Tenant selection for the Section 8 Tenant-Based Rental Assistance is based on income and the date and time of application. The waiting list for Section 8 was opened on June 1, 2023 and closed on September 22, 2023.

A waiting list is maintained for the properties under the Project Based Voucher program. The Project Based Voucher waiting lists each have specific preferences that include limiting preference to individuals referred by partnering organizations. These are outlined in the Section 8 Administrative plan, Chapter 17.

Preferences: No new preferences are proposed for CY2025

HC has adopted the following local preferences for the Tenant-Based Voucher (TBV) program:

1. **Reasonable Accommodation & Accessibility:** a preference will be given to existing HC residents or participants who currently reside in units assisted by HC that do not meet their accessibility needs and need a transfer and/or a tenant-based voucher to locate a unit to accommodate a disability under a request for reasonable accommodation.
2. **Relocation:** a preference will be given to existing HC residents or participants who reside in HC-assisted units and are required to move under the Uniform Relocation Act (URA) due to use, repurpose or a demolition/disposition or other related activity.
3. **Domestic Violence / VAWA:** a preference will be given to existing HC residents or participants to who are seeking to transfer from any covered housing program operated by HC (including Public Housing, Project-Based, Tenant-Based, etc.) for displacement due to domestic violence, dating violence, sexual assault, stalking or human trafficking, as defined by VAWA.
4. **Victims of Hate Crimes:** to verify qualification for this preference, HC will require certification by a law enforcement agency or other reliable information that the applicant has been the victim of a hate crime.
5. **Displaced Due to Disaster:** HC's Board may invoke a preference for families displaced or at imminent risk of being displaced by a gubernational or federally declared disaster under terms and for a duration chosen by the Board when such preference is invoked, or any family that has been terminated from its HCV program due to insufficient program funding.
6. **Family Unification Program (FUP) Youth:** a preference will be given to participants in HC's FUP Youth program whose assistance is expiring and will have a lack of adequate housing as a result of their termination from the program, or other similar category. Qualifying participants must first place their name on the Centralized Waiting List to qualify for this preference. If the waiting list is closed, the participant may request for HC to add their name to the waiting list to be able to access this preference category.
7. **Moving On Initiative:** a preference will be given for up to 5 vouchers per calendar year to families in the Permanent Supportive Housing (PSH) Program, who are moving on from supportive services.

8. **Homeless:** HC will provide a preference for up to 25 vouchers issued per calendar year to individuals and families referred to HC through the Coordinated Entry System. HC will notify the Coordinated Entry system partner of voucher availability.
9. **Project-Based Voucher (PBV) and Rental Assistance Demonstration (RAD) Choice Mobility:** HC PBV participants in good standing who have leased a unit for at least 1 year under HC's PBV program (including units converted to Section 8 PBV assistance under the RAD or other conversion programs), are eligible to voluntarily relinquish their project-based subsidy and will be given a preference on the waiting list to receive a tenant-based voucher, when available, to move with continued assistance.

Financial Resources

Source	Amount	Planned Use
Public Housing Operating Fund	824,604	General Operations PH
Public Housing Capital Fund	1,191,402	See CDF plan
Housing Choice Voucher Assistance	37,143,567	Rental Assistance
Mainstream Voucher Assistance	3,075,875	Rental Assistance
Emergency Housing Voucher Assistance	1,437,765	Rental Assistance
Resident Opportunity & Self Sufficiency	351,336	Family Self-Sufficiency/ROSS Public Housing
HOME/State/County Funding	5,711,841	Rental Assistance
HOPWA	866,639	Rental Assistance
Continuum of Care	5,108,815	Rental Assistance
Temporary Assistance for Needy Families	1,895,823	Parent Education
Public Housing Dwelling Rent	585,137	General Operations PH
Management Income	748,791	General Administrative Operations
Other Dwelling Rent	3,154,957	Operations and Non-Subsidized Units
HCV Fraud Recovery	50,000	HCV Administrative Operations
Interest Income	595,730	General Administrative Operations
Other Revenue	13,650,654	General Administrative Operations
TOTAL:	61,478,890	

Rent Determination

Housing Connect was awarded a Moving to Work (MTW) PHA under Expansion Cohort 2 in May 2021 and is participating in a rent reform study with HUD that started in Spring of 2023. All details of the rent study including rent determination are outlined in our approved FY 22-23 Annual Plan with Moving to Work Supplement.

All policies specific to the Stepped Rent Policy and Rent Determination are reflected in updated versions of our Admissions and Continued Occupancy Policies (ACOP) and Section 8 Admin Plans located at www.housingconnect.org. Aside from Stepped Rent there are no changes in how rents are determined.

Homeownership Programs

Housing Connect's Resident Services Department offers programs to housing authority residents that encourage and promote self-sufficiency and upward mobility. The programs, Family Self-Sufficiency Program (FSS), and ROSS Service Coordinator Program provide opportunities for employment counseling, home-ownership counseling and opportunities to become self-sufficient.

Housing Connect has policies in place to operate the homeownership option to assist a family residing in a home purchased and owned by one or more members of the family in conjunction with the HCV program, and are exploring the potential implementation of such a program.

Upon implementation of this program, Housing Connect has a placeholder of funding for up to \$500,000, as budget allows, to support homeownership efforts for low-income families who are first time home buyers and have completed financial counseling and home ownership education.

Safety and Crime Prevention (VAWA)

Housing Connect ensures that all Public Housing residents, Section 8 Housing Choice Voucher program residents and Landlords, and other housing program residents are notified about their rights and of their obligation under VAWA. We offer many choices regarding housing options such as moving, removal of the perpetrator and providing referrals to an outside agency that can offer help to the families. It is our policy to maintain the highest standard of confidentiality while making every opportunity available to victims so that they may feel safe and maintain housing. As needed Housing Connect works in collaboration with all local police jurisdictions to support residents with protections under VAWA.

Pet Policy

See Public Housing Admissions and Continued Occupancy Policies at www.housingconnect.org.

Substantial Deviation

As required pursuant to HUD regulations at 24 CFR 903.7 (r) and 24 CFR 905.3, Housing Connect has established the following definitions:

Substantial Deviation – A substantial deviation is defined as a modification that substantially alters the mission, goals and outcomes described in Housing Connect's approved 5-Year PHA Plan. Housing Connect will include a discussion of substantial deviations from the 5-Year PHA Plan in its Annual PHA Plan narrative. The substantial deviation definition excludes the following:

1. Changes to the Capital Fund Budget produced as a result of each approved Rental Assistance Demonstration (RAD) or Disposition Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
2. Changes to the construction and rehabilitation plan for each approved RAD conversion;
3. Changes to the financing structure for each approved RAD or Disposition conversion;
4. Changes to the Relocation Plan and processes for each approved RAD or Disposition conversion.

5. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance

Significant Amendment/Modification

A significant amendment or modification to the 5-Year PHA Plan or Annual PHA Plan excludes items described in the definition of “substantial deviation” and is defined to include: substantive changes to rent, admission policies, or organization of the waiting list(s) in the Public Housing or Housing Choice Voucher Program; and, newly proposed demolition, disposition, designated housing, homeownership, or public housing conversion activities. A significant amendment or modification to the Capital Fund Program (CFP) 5-Year Action Plan excludes items described in the definition of “substantial deviation” and is defined to include: new demolition, disposition, homeownership, Capital Fund financing, development, or mixed-finance proposals; and, additions of non-emergency work items not included in the current CFP Annual Statement or CFP 5-Year Action Plan that exceed \$1 million. New activities or changes to activities that are required due to HUD regulations, federal statutes, state or local laws/ordinances, or as a result of a declared national or local emergency are excluded from the definition of significant amendment or modification. A significant amendment or modification to the 5-Year PHA Plan, Annual PHA Plan and/or CFP 5-Year Action Plan requires Housing Connect to undertake public comment and review, Board approval and HUD review/approval processes in accordance with HUD regulations.

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B.2. New Activities

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Attachment B.2. Housing Connect New Activities

Hope VI

N/A

Mixed Finance Modernization or Development

Housing Connect may submit Mixed-Finance applications under the “Faircloth to RAD” program in order to create new affordable housing units. No projects have yet been identified. Housing Connect is vetting the utilization of Project-Based Vouchers under the “Faircloth to RAD” program to support development or to increase deeply affordable housing in the south part of the Salt Lake Valley.

To ensure RAD conversions are viable and have sufficient cash flow, Housing Connect will augment or supplement the RAD contract rents in order to make a RAD conversion viable. This could pertain to a RAD conversion or in the circumstances of a Faircloth to RAD conversion. HC will comply with all applicable MTW provisions outlined in the MTW Operations Notice and/or RAD provisions outlined in the RAD Notice, Notice PIH 2012-32, REV-4 or its successor notice.

Demolition and/or Disposition

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In late calendar year 2023, Housing Connect received Section 18 Obsolescence Disposition Approval for Granger Apartments (UT003000048-48), a 24-unit family public housing development located in northern West Valley City. The property was constructed in 1974 and consists of 14 two-bedroom units (700 NSF) and 10 four-bedroom units (1,119 NSF) on a 2.64-acre site. The unit #s are as follows: 738, 742, 744, 748, 750, 751, 752, 753, 754, 755, 757, 760, 762, 764, 765, 766, 767, 768, 769, 770, 786, 788, 790, 793. Housing Connect applied for Tenant Protection Vouchers for all 24 units.

The project received an award of 9% housing tax credits in July 2022. The substantial rehabilitation of the property will address all capital deficiencies identified in the Obsolescence PNA. At financial closing, the land and improvements was transferred via a long-term ground lease to a new LLC controlled by the Authority. The property currently contained 2 fully accessible units. Housing Connect is creating 5 or a total of 5 additional accessible units as part of the rehabilitation.

Housing Connect submitted the Section 18 Disposition Application for Granger Apartments in January 2023. Financial closing occurred in September 2023.

Housing Connect via a significant amendment to the 2024 Annual Plan and MTW Supplement was approved to remove public housing property under disposition rules authorized by Section 18 of the US Housing Act of 1937. (Page 24) at Valley Fair Village, UT003000002. West Valley City is widening Lancer Way (3650 South) and proposed a partial acquisition of a small piece of land along the South property line. This purchase did not affect any of the buildings or common area spaces therefore the Housing Connect agreed to proceed with the proposed transaction.

Conversion of Public Housing to Tenant Based Assistance

Housing Connect is in the evaluation process to assess the need and feasibility for conversion to Tenant Based Assistance either by way of Section 18 or Section 22 for the following project:

Valley Fair Village	UT003000002A	100	HC plans to maintain the property as Public Housing but will continue to evaluate the feasibility of redeveloping the property at a higher density.
Harmony Park	UT003000003	20	HC plans to maintain the property as Public Housing but will continue to evaluate the feasibility of redeveloping the property or utilizing a streamlined conversion through Section 22; either option could include at a higher density plan.
Union	UT003000003	30	HC plans to maintain the property as Public Housing but will continue to evaluate the feasibility of redeveloping the property or utilizing a streamlined conversion through Section 22; either option could include at a higher density plan.
Erin Meadows	UT003000003	34	HC plans to maintain the property as Public Housing but will continue to evaluate the feasibility of redeveloping the property or utilizing a streamlined conversion through Section 22; either option could include at a higher density plan.

Conversion of Public Housing to Project-Based Assistance under RAD

Housing Connect does not have any current plans for conversion under RAD.

Project-Based Vouchers

Housing Connect utilizes project-based vouchers to spur development of affordable housing and to increase housing choice in underserved parts of Salt Lake County and/or opportunity areas.

To date, the following PBV's have been allocated:

Table 1

Community	# of PBV's
Bud Bailey	45
Central City	25
Grace Mary Manor	48
Kelly Benson	33
Medina Place	40
Family Support Center	9
Palmer Court	56
The Road Home Scattered	5
Total:	261

Additionally, Housing Connect has the following PBV's from various conversions or other HUD approved mechanisms:

Table 2

Community	# of PBV's
Westlake	10
Academy Park, Cyprus Park and Kearns	84
Hunter	20
Scattered Properties	28
New City Plaza (formerly Senior High Rise)	299
East 72 (formerly Sunset Gardens)	36
VASH	24
Granger	24
Total:	525

With an approved MTW waiver for implementation July 1, 2022 and Housing Connect's Board of Commissioners approval, policies are in place to allow Housing Connect to project-base up to 35% of vouchers utilizing MTW flexibilities. New project-based vouchers will be reflected in the respective tables from year to year.

Units with Approved Vacancies for Modernization

Housing Connect requests and receives approval from the local field office prior to placing any unit(s) into modernization status. Requests are made when a contract for modernization work has been awarded.

Other Capital Grant Programs

Under the MTW Operations Notice, HC is authorized to utilize Public Housing Operating Fund, Capital Fund Program and certain Housing Assistance Payments funds flexibly and interchangeably for any purpose authorized under Sections 8 and 9 of the US Housing Act of 1937 and for local, non-traditional activities. Housing Connect may utilize this flexibility over the fiscal year to support activities described in the Annual Plan in accordance with the requirements of the Operations Notice and consistent with HC's Board-approved budgets. Housing Connect intends to use Capital Fund to support the RAD/Section 18 blend renovation of New City Plaza.

B.3. Progress Report

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Attachment B.3. Progress Report

Progress Report

2021-2025 Agency Goals

- Maintain high performer status with HUD subsidized Housing Programs
 - Most recently received High Performer status in the Housing Choice Voucher program with 100% SEMAP score and High Performer status in Public Housing program at 90%.
 - As an MTW agency, in accordance with the MTW Operations Notice we have opted to waive scoring on PHAS but to be scored on SEMAP through FY 23 ending June 30, 2023.
- Increase affordable housing physical units by 350
 - Increased 157 at the HUB in fiscal year 2020-2021
 - Increased 65 at East 72 in fiscal year 2023

*Preserved 30 units at Parkhill Mobile Home Community FY 2021-2022

*Preserved 150 units acquired from the Salt Lake City Housing Authority at New City Plaza in fiscal year FY 2021-2022

- Increase affordable rental subsidies by 300 units
 - Increased 861 total subsidies outlined below:
 - 72 FUP - FY21
 - 111 Mainstream - FY21
 - 10 VASH - FY21
 - 10 HOPWA - FY21
 - 9 HARP - FY21
 - 25 Behavioral Health PBV - FY21
 - 131 Emergency Housing Vouchers - FY22
 - 21 Behavioral Health PBV – FY22
 - 5 VASH – FY22
 - 179 New City Plaza Protection Vouchers – FY22
 - 30 Mainstream - FY23
 - 20 Traditional HCV – FY23
 - 5 VASH – FY23
 - 24 Sunset Gardens/East 72 Protection Vouchers - FY23
 - 16 HOPWA – FY23
 - 70 Emergency Afghan Rental Housing (Short-term) – FY23
 - 50 Afghan Rental Assistance – FY23
 - 50 FUP 2024
 - 23 Granger Protection Vouchers 2023/2024
- Diversify funding
 - Over the last 19 years, we have increased our non-HUD funding from 11% of total funding in 2005 to 39% funding in 2023. Our goal is to continue to diversify our funding further in the next several years. We will do this by increasing funding in the State of Utah, Salt Lake County, and other local government funding, as well as increasing the number of properties serving low-income households and thus increasing tenant rent income. We are also increasing our developer's fee revenue with more new developments each year.

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As a MTW agency, we also have the flexibility to apply fungibility among public housing Operating Fund, public housing Capital Fund, and HCV HAP and Administrative Fee assistance. These flexibilities expand the eligible uses of each covered funding stream, but do not negate the need for accountability from its original source as well as compliance with federal grant and financial management requirements. This fungibility allows our agency to utilize funds most effectively and efficiently to further enhance the diversification of our funding.

- Reposition and secure long-term viability of Public Housing properties
 - Housing Connect originally had 626 Public Housing units. 263 units have been converted to RAD units. 179 units were disposed of under Section 18. There are currently 184 units of Public Housing to reposition and secure long-term viability.
 - In 2021, Granger was awarded 9% LIHTCs. Housing Connect submitted a Section 18 disposition application that was approved in September 2023. Housing Connect submitted for, and is eligible to receive, 23 tenant-protection vouchers. Rehabilitation is presently underway and expected to finish by late calendar year 2024.
- Enhance and grow supportive services that maintain housing assistance and promote well-being
 - Housing Connect continued its focus on 6 Social Determinants of Health (SDoH), which include Housing Stability, Food Security, Education, Financial Stability, Health Access and Community Connection. A new services coordinator position (1 FTE) was added to oversee service delivery at the Housing Connect properties of The Hub and East 72, both low-income tax credit housing communities. In addition, Housing Connect through its partnership with Millcreek City and its Promise Partnership, was able to provide childcare for participants attending English as a Second Language classes at Bud Bailey Apartments. This enhancement of the services provided by the English Skills Learning Center increased attendance by 125%+ and it is anticipated that testing will show a greater increase in English skills attainment.

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The following services continue to be offered at New City Plaza and Valley Fair Village to support resident wellbeing: services coordination and case management, assistance with getting on or maintaining government benefits, digital literacy, assistance applying for discounted internet, coordination with health care providers and/or home health, connections to meals on wheels, bingo, health fairs, and other community events that strengthen the apartment community.

B.4. Capital Improvements

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**Attachment D.1.
Capital Improvements**

Capital Improvements

Attached is the 2023-2028 Capital Fund 5 year plan which was approved by HUD on 5/8/2024. The next 5 year plan that we submit to HUD will earmark \$700,000 out of the 2024 capital fund to pay for construction costs for New City Plaza.

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Capital Fund Program - Five-Year Action Plan

Status: Approved

Approval Date: 05/08/2024

Approved By: SMITH-DREIER, CHRISTINE

Part I: Summary						
PHA Name : Housing Authority of the County of Salt Lake		Locality (City/County & State)				
PHA Number: UT003		<input checked="" type="checkbox"/> Original 5-Year Plan <input type="checkbox"/> Revised 5-Year Plan (Revision No:)				
A.	Development Number and Name	Work Statement for Year 1 2024	Work Statement for Year 2 2025	Work Statement for Year 3 2026	Work Statement for Year 4 2027	Work Statement for Year 5 2028
	ERIN MEADOWS (UT003000003)	\$91,690.00	\$405,876.00	\$405,876.00	\$405,876.00	\$405,876.00
	AUTHORITY-WIDE	\$1,100,361.00	\$400,362.00	\$400,362.00	\$400,362.00	\$400,362.00
	VALLEY FAIR VILLAGE (UT003000002)	\$109,157.00	\$494,970.00	\$494,970.00	\$494,970.00	\$494,970.00

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Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 1 2024				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	ERIN MEADOWS (UT003000003)			\$91,690.00
ID0071	Physical Improvements including Force Account(Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Lighting,Dwelling Unit-Site Work (1480)-Parking,Dwelling Unit-Site Work (1480)-Pedestrian paving,Dwelling Unit-Site Work (1480)-Seal Coat,Dwelling Unit-Site Work (1480)-Striping,Dwelling Unit-Site Work (1480)-Water Lines/Mains,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Exterior Stairwells - Fire Escape,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Stairwells - Fire Escapes,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine))	Physical improvements to dwellings		\$91,690.00
	AUTHORITY-WIDE (NAWASD)			\$1,100,361.00
ID0083	Management Improvements(Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements)	Improvements to Central Office IT systems & Training activities		\$10,000.00

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Part II: Supporting Pages - Physical Needs Work Statements (s)**Work Statement for Year** 1

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0087	Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	Administration of Capital Fund		\$130,120.00
ID0091	Operations(Operations (1406))	Operations Costs		\$260,241.00
ID0122	MTW New City Plaza Construction(MTW (1492))	MTW New City Plaza Construction		\$700,000.00
	VALLEY FAIR VILLAGE (UT003000002)			\$109,157.00
ID0103	Physical Improvements including Force Account(Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Exterior Stairwells - Fire Escape,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Lighting,Dwelling Unit-Site Work (1480)-Other,Dwelling Unit-Site Work (1480)-Seal Coat,Dwelling Unit-Site Work (1480)-Striping,Dwelling	Physical Improvements to Dwellings		\$109,157.00

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Work Statement for Year 2 2025				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0102	Administration(Administration (1410)-Sundry,Administration (1410)-Other,Administration (1410)-Salaries)	Administration		\$130,121.00
	ERIN MEADOWS (UT003000003)			\$405,876.00
ID0110	Physical Improvements including Force Account(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Exterior Stairwells - Fire Escape,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings, Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Stairwells - Fire Escapes,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Lighting,Dwelling Unit-Site Work (1480)-Parking,Dwelling Unit-Site Work (1480)-Pedestrian paving,Dwelling Unit-Site Work (1480)-Seal Coat Dwelling Unit-Site Work (1480)-Striping,Dwelling	Physical improvements to dwellings		\$405,876.00
	Subtotal of Estimated Cost			\$1,301,208.00

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Work Statement for Year 3 2026				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	ERIN MEADOWS (UT003000003)			\$405,876.00
ID0105	Physical Improvements including Force Account(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Exterior Stairwells - Fire Escape,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Stairwells - Fire Escapes,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodos,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Lighting,Dwelling Unit-Site Work (1480)-Parking,Dwelling Unit-Site Work (1480)-Pedestrian paving,Dwelling Unit-Site Work (1480)-Seal Coat,Dwelling Unit-Site Work (1480)-Striping,Dwelling Unit-Site Work (1480)-Water Lines/Mains,Dwelling Unit-Exterior (1480)-Windows)	Physical improvements to dwellings		\$405,876.00
	VALLEY FAIR VILLAGE (UT003000002)			\$494,970.00
ID0106	Physical Improvements including Force Account(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Exterior Stairwells - Fire Escape,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non	Physical Improvements to Dwellings		\$494,970.00

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Work Statement for Year 3 2026				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	cyclical), Dwelling Unit-Interior (1480)-Commodes, Dwelling Unit-Interior (1480)-Electrical, Dwelling Unit-Interior (1480)-Flooring (non routine), Dwelling Unit-Interior (1480)-Interior Doors, Dwelling Unit-Interior (1480)-Interior Painting (non routine), Dwelling Unit-Interior (1480)-Kitchen Cabinets, Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets, Dwelling Unit-Interior (1480)-Mechanical, Dwelling Unit-Interior (1480)-Other, Dwelling Unit-Interior (1480)-Plumbing, Dwelling Unit-Interior (1480)-Tubs and Showers, Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving, Dwelling Unit-Site Work (1480)-Curb and Gutter, Dwelling Unit-Site Work (1480)-Fencing, Dwelling Unit-Site Work (1480)-Landscape, Dwelling Unit-Site Work (1480)-Lighting, Dwelling Unit-Site Work (1480)-Other, Dwelling Unit-Site Work (1480)-Seal Coat, Dwelling Unit-Site Work (1480)-Striping, Dwelling Unit-Site Work (1480)-Water Lines/Mains)			
	AUTHORITY-WIDE (NAWASD)			\$400,362.00
ID0108	Operations(Operations (1406))	Operations		\$260,241.00
ID0109	Management Improvement(Management Improvement (1408)-Empowerment Activities, Management Improvement (1408)-Equal Opportunity, Management Improvement (1408)-Other, Management Improvement (1408)-RMC Costs, Management Improvement (1408)-Security Improvements (not police or guard-non-physical), Management Improvement (1408)-Staff Training, Management Improvement (1408)-System Improvements)	Management Improvement		\$10,000.00
ID0111	Administration(Administration (1410)-Other, Administration (1410)-Salaries, Administration (1410)-Sundry)	Administration		\$130,121.00
	Subtotal of Estimated Cost			\$1,301,208.00

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Work Statement for Year 4 2027				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			\$400,362.00
ID0112	Operations(Operations (1406))	Operations		\$260,241.00
ID0113	Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	Administration		\$130,121.00
ID0114	Management Improvements(Management Improvement (1408)-Other,Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements)	Management Improvements		\$10,000.00
	VALLEY FAIR VILLAGE (UT003000002)			\$494,970.00
ID0115	Physical Improvements including Force Account(Dwelling Unit-Development (1480)-Site Acquisition,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Exterior Stairwells - Fire Escape,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Mail Facilities,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Stairwells - Fire Escapes,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-	Physical Improvements including Force Account		\$494,970.00

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Work Statement for Year 4 2027				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	(1480)-Bathroom Flooring (non cyclical), Dwelling Unit-Interior (1480)-Call-for-Aid Systems, Dwelling Unit-Interior (1480)-Commodes, Dwelling Unit-Interior (1480)-Electrical, Dwelling Unit-Interior (1480)-Flooring (non routine), Dwelling Unit-Interior (1480)-Interior Doors, Dwelling Unit-Interior (1480)-Interior Painting (non routine), Dwelling Unit-Interior (1480)-Kitchen Cabinets, Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets, Dwelling Unit-Interior (1480)-Mechanical, Dwelling Unit-Interior (1480)-Other, Dwelling Unit-Interior (1480)-Plumbing, Dwelling Unit-Interior (1480)-Tubs and Showers, Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving, Dwelling Unit-Site Work (1480)-Curb and Gutter, Dwelling Unit-Site Work (1480)-Dumpsters and Enclosures, Dwelling Unit-Site Work (1480)-Electric Distribution, Dwelling Unit-Site Work (1480)-Fence Painting, Dwelling Unit-Site Work (1480)-Fencing, Dwelling Unit-Site Work (1480)-Landscape, Dwelling Unit-Site Work (1480)-Lighting, Dwelling Unit-Site Work (1480)-Other, Dwelling Unit-Site Work (1480)-Parking, Dwelling Unit-Site Work (1480)-Pedestrian paving, Dwelling Unit-Site Work (1480)-Playground Areas - Equipment, Dwelling Unit-Site Work (1480)-Seal Coat, Dwelling Unit-Site Work (1480)-Sewer Lines - Mains, Dwelling Unit-Site Work (1480)-Signage, Dwelling Unit-Site Work (1480)-Storm Drainage, Dwelling Unit-Site Work (1480)-Striping, Dwelling Unit-Site Work (1480)-Water Lines/Mains)			
	ERIN MEADOWS (UT003000003)			\$405,876.00
ID0116	Physical Improvements Including Force Account(Dwelling Unit-Development (1480)-New Construction, Dwelling Unit-Development (1480)-Other, Dwelling Unit-Development (1480)-Site Acquisition, Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc, Dwelling Unit-Exterior (1480)-Building Slab, Dwelling Unit-Exterior (1480)-Canopies, Dwelling Unit-Exterior (1480)-Carports -Surface Garage, Dwelling Unit-Exterior (1480)-Columns and Porches, Dwelling Unit-Exterior (1480)-Decks and Patios, Dwelling Unit-Exterior (1480)-Exterior Doors, Dwelling Unit-Exterior (1480)-Exterior Lighting, Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking, Dwelling Unit-Exterior (1480)-Exterior Stairwells - Fire Escape, Dwelling Unit-Exterior (1480)-Foundations, Dwelling Unit-Exterior (1480)-Gutters - Downspouts, Dwelling Unit-Exterior (1480)-Landings and Railings, Dwelling Unit-Exterior (1480)-Mail Facilities, Dwelling Unit-Exterior (1480)-Other, Dwelling Unit-Exterior (1480)-Roofs, Dwelling Unit-Exterior (1480)-Siding, Dwelling Unit-Exterior (1480)-Soffits, Dwelling Unit-Exterior (1480)-Stairwells - Fire Escapes, Dwelling Unit-Exterior (1480)-Tuck-Pointing, Dwelling Unit-Exterior (1480)-Windows, Dwelling Unit-Interior (1480)-Appliances, Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks, Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical), Dwelling Unit-Interior (1480)-Call-for-Aid Systems, Dwelling Unit-Interior (1480)-Commodes, Dwelling Unit-Interior (1480)-Electrical, Dwelling Unit-Interior (1480)-Flooring (non routine), Dwelling Unit-Interior (1480)-Interior Doors, Dwelling Unit-Interior (1480)-Interior Painting (non routine), Dwelling Unit-Interior (1480)-Kitchen Cabinets, Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets, Dwelling Unit-Interior (1480)-	Physical Improvements Including Force Account		\$405,876.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	ERIN MEADOWS (UT003000003)			\$405,876.00
ID0117	Physical Improvements Including Force Account(Dwelling Unit-Development (1480)-New Construction,Dwelling Unit-Development (1480)-Other,Dwelling Unit-Development (1480)-Site Acquisition,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Exterior Stairwells - Fire Escape,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Mail Facilities,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Stairwells - Fire Escapes,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Call-for-Aid Systems,Dwelling Unit-Interior (1480)-Commodores,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Dumpsters and Enclosures,Dwelling Unit-Site Work (1480)-Electric Distribution,Dwelling Unit-Site Work (1480)-Fence Painting,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Lighting,Dwelling Unit-Site Work (1480)-Other,Dwelling Unit-Site Work (1480)-Parking,Dwelling Unit-Site Work (1480)-Pedestrian paving,Dwelling Unit-Site Work (1480)-Playground Areas - Equipment,Dwelling Unit-Site Work (1480)-Seal Coat,Dwelling Unit-Site Work (1480)-Sewer Lines - Mains,Dwelling Unit-Site Work (1480)-Water Lines/Mains,Dwelling Unit-Site Work (1480)-Signage,Dwelling Unit-Site Work (1480)-Storm Drainage,Dwelling Unit-Site Work (1480)-Striping)	Physical Improvements Including Force Account		\$405,876.00
	VALLEY FAIR VILLAGE (UT003000002)			\$494,970.00

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Work Statement for Year 5 2028				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0118	Physical Improvements including Force Account(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports - Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Exterior Stairwells - Fire Escape,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Mail Facilities,Dwelling Unit-Exterior (1480)-Other,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Stairwells - Fire Escapes,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Call-for-Aid Systems,Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Dumpsters and Enclosures,Dwelling Unit-Site Work (1480)-Electric Distribution,Dwelling Unit-Site Work (1480)-Fence Painting,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Lighting,Dwelling Unit-Site Work (1480)-Other,Dwelling Unit-Site Work (1480)-Parking,Dwelling Unit-Site Work (1480)-Pedestrian paving,Dwelling Unit-Site Work (1480)-Playground Areas - Equipment,Dwelling Unit-Site Work (1480)-Seal Coat,Dwelling Unit-Site Work (1480)-Sewer Lines - Mains,Dwelling Unit-Site Work (1480)-Signage,Dwelling Unit-Site Work (1480)-Storm Drainage,Dwelling Unit-Development (1480)-Site Acquisition,Dwelling Unit-Site Work (1480)-Striping,Dwelling Unit-Site Work (1480)-Water	Physical Improvements including Force Account		\$494,970.00
	AUTHORITY-WIDE (NAWASD)			\$400,362.00
ID0119	Management Improvements(Management Improvement (1408)-Other,Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements)	Management Improvements		\$10,000.00

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 5 2028				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0120	Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	Administration		\$130,121.00
ID0121	Operations(Operations (1406))	Operations		\$260,241.00
	Subtotal of Estimated Cost			\$1,301,208.00

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Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
2577-0274
02/28/2022

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 1	2024
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Management Improvements(Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements)	\$10,000.00
Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	\$130,120.00
Operations(Operations (1406))	\$260,241.00
MTW New City Plaza Construction(MTW (1492))	\$700,000.00
Subtotal of Estimated Cost	\$1,100,361.00

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Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
2577-0274
02/28/2022

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 2	2025
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Operations(Operations (1406))	\$260,241.00
Management Improvement(Management Improvement (1408)-Empowerment Activities,Management Improvement (1408)-Equal Opportunity,Management Improvement (1408)-Other,Management Improvement (1408)-RMC Costs,Management Improvement (1408)-Security Improvements (not police or guard-non-physical),Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements)	\$10,000.00
Administration(Administration (1410)-Sundry,Administration (1410)-Other,Administration (1410)-Salaries)	\$130,121.00
Subtotal of Estimated Cost	\$400,362.00

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Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year	3 2026
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Operations(Operations (1406))	\$260,241.00
Management Improvement(Management Improvement (1408)-Empowerment Activities,Management Improvement (1408)-Equal Opportunity,Management Improvement (1408)-Other,Management Improvement (1408)-RMC Costs,Management Improvement (1408)-Security Improvements (not police or guard-non-physical),Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements)	\$10,000.00
Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundries)	\$130,121.00
Subtotal of Estimated Cost	\$400,362.00

Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
2577-0274
02/28/2022

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 4	2027
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Operations(Operations (1406))	\$260,241.00
Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	\$130,121.00
Management Improvements(Management Improvement (1408)-Other,Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements)	\$10,000.00
Subtotal of Estimated Cost	\$400,362.00

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Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
2577-0274
02/28/2022

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 5	2028
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Management Improvements(Management Improvement (1408)-Other,Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements)	\$10,000.00
Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	\$130,121.00
Operations(Operations (1406))	\$260,241.00
Subtotal of Estimated Cost	\$400,362.00

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3. MTW Supplement

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PHA Name : Salt Lake County (Housing Connect)

PHA Code : UT003

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 1/1/2025

PHA Program Type: Combined

MTW Cohort Number: Stepped and Tiered Rent

MTW Supplement Submission Type: Annual Submission

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B. MTW Supplement Narrative.

The Housing Authority of the County of Salt Lake dba Housing Connect (HC) was designated as a Moving To Work (MTW) agency in May 2021 as part of MTW "Cohort #2" which involves a six-year evaluation of alternative rent policies designed to increase resident self-sufficiency and reduce administrative burdens. HC will also implement other allowable MTW activities above and beyond the alternative rent policies evaluation program.

Housing Connect is committed to MTW's 3 statutory objectives of achieving greater cost effectiveness in federal expenditures, increasing self-sufficiency and increasing housing choice for low-income families. Housing Connect MTW flexibility will support HC's mission to connect people and communities to quality affordable housing opportunities while promoting self-sufficiency and neighborhood revitalization.

As an expansion MTW agency Housing Connect will implement activities to further this mission and support the 3 statutory objectives over the course of its 20-year term of participation in the MTW program. At MTW designation, Housing Connect created its MTW Advisory Committee comprised of HC residents, local partner agencies, stakeholders, and HC staff. Meeting regularly and/or receiving feedback from this group of experts has provided a valuable forum for feedback on proposed waivers and has provided valuable insight to the potential impact and perspective of residents. In addition to the MTW Advisory Committee, Housing Connect has a strong and dedicated Board along with competent staff to guide and support new initiatives. Most important is the role of current residents; through feedback meetings and public hearings with residents and our Resident Advisory Board we will continue to seek input and suggestions to guide our successes.

HC is participating in a stepped rent policy for qualified Housing Choice Voucher (HCV) and Public Housing (PH) households. The rent policy will increase the family's rent payment/TTP on a fixed schedule in both frequency and amount. The fixed schedule/stepped rent policy will be disaggregated from family income allowing a family to keep more of their increased income therefore giving incentives to working families and providing opportunities to increase their self-sufficiency. The implementation of Stepped Rent will continue to be HC's top priority, including educating residents on program benefits, enrolling residents in the evaluation through random assignment and enhancing partnerships to support the initiative.

Other previously approved waivers include but are not limited to an alternative simplified utility allowance, self-certification of assets up to \$50,000, increased flexibility to streamline income verification, flexibilities regarding HQS inspections for PBV units that HC owns manages and controls, an enhanced Family Self-Sufficiency program, an alternative reexamination schedule allowing for elderly and disabled households to reexamine on a triennial basis, and landlord incentives with the goal to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options.

New waiver requests in HC's CY 2025 MTW Supplement include flexibilities related to excluding asset income up to \$50,000. Additional MTW components will evolve over time and be proposed annually in accordance with the MTW Operations Notice. The policies described in the MTW Supplement may be modified based on further guidance from HUD.

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	
c. Stepped Rent (PH)	Currently Implementing
d. Stepped Rent (HCV)	Currently Implementing
i. Alternative Utility Allowance (PH)	Currently Implementing
j. Alternative Utility Allowance (HCV)	Currently Implementing
v. Alternative Income Inclusions/Exclusions (PH)	Plan to Implement in the Submission Year
w. Alternative Income Inclusions/Exclusions (HCV)	Plan to Implement in the Submission Year
2. Payment Standards and Rent Reasonableness	
b. Payment Standards- Fair Market Rents (HCV)	Currently Implementing
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Currently Implementing
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
c. Self-Certification of Assets (PH)	Currently Implementing
d. Self-Certification of Assets (HCV)	Currently Implementing
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Plan to Implement in the Submission Year
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Currently Implementing
c. Third-Party Requirement (HCV)	Currently Implementing
6. Short-Term Assistance	
7. Term-Limited Assistance	
8. Increase Elderly Age (PH & HCV)	
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Currently Implementing
b. Increase PBV Project Cap (HCV)	Currently Implementing
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Currently Implementing
10. Family Self-Sufficiency Program with MTW Flexibility	
d.PH Modify or Eliminate the Contract of Participation (PH)	Currently Implementing
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Currently Implementing
e.PH Policies for Addressing Increases in Family Income (PH)	Currently Implementing
e.HCV Policies for Addressing Increases in Family Income (HCV)	Currently Implementing
11. MTW Self-Sufficiency Program	
12. Work Requirement	
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
14. Moving on Policy	
15. Acquisition without Prior HUD Approval (PH)	
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	
c. Housing Development Programs	Currently Implementing

C. MTW Activities Plan that Salt Lake County (Housing Connect) Plans to Implement in the Submission Year or Is Currently Implementing

1.c. - Stepped Rent (PH)
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>HC was approved for this waiver in its FY 2022-2023 MTW Supplement, implementation began 9/1/2023 and will continue through 8/31/2024. As part of the cohort-specific Rent Reform study, Housing Connect will implement a stepped rent model for qualified Public Housing (PH) households as outlined by HUD in the Stepped Rent Policy.</p> <p>The rent model will increase the family's rent payment/TTP on a fixed schedule in both frequency and amount. The fixed schedule/stepped rent model will be disaggregated from family income allowing a family to keep more of their increased income therefore giving incentives to working families and providing opportunities to increase their self-sufficiency.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness; Self-sufficiency</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Neutral (no cost implications)</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>New admissions and currently assisted households</p>
<p>Does the MTW activity apply to all family types or only to selected family types?</p> <p>The MTW activity applies only to selected family types</p>
<p>Please select the family types subject to this MTW activity.</p> <p>Other – another specifically defined target population or populations.</p>
<p>If Other Selected in Previous Question: Please describe this target population in the text box.</p> <p>All non-elderly, non-disabled households currently or newly receiving a PH subsidy that do not meet any of the exclusion criteria are eligible for enrollment into the STRD study.</p>
<p>Does the MTW activity apply to all public housing developments?</p> <p>The MTW activity applies to specific developments</p>
<p>Which developments participate in the MTW activity?</p> <p>Harmony Park Apartments (South Main)</p> <p>Union Plaza</p> <p>Erin Meadows</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>Implementation began 9/1/2023 and continues in accordance with approved policies.</p>

<p>Does this MTW activity require a hardship policy?</p> <p>Yes</p> <p>This document is attached.</p>
<p>Does the hardship policy apply to more than this MTW activity?</p> <p>Yes</p>
<p>Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</p> <p>1.c. - Stepped Rent (PH); 1.d. - Stepped Rent (HCV); 3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)</p>
<p>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</p> <p>No</p>
<p>How many hardship requests have been received associated with this activity in the past year?</p> <p>1.00</p> <p>How many hardship requests were approved?</p> <p>1</p> <p>How many hardship requests were denied?</p> <p>0</p> <p>How many are pending?</p> <p>0</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Does the MTW activity require an impact analysis?</p> <p>Yes</p> <p>This document is attached.</p>
<p>Does the impact analysis apply to more than this MTW activity?</p> <p>Yes</p>
<p>Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)</p> <p>1.c. - Stepped Rent (PH); 1.d. - Stepped Rent (HCV); 3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)</p>
<p>Describe how the stepped rent is structured, including the following: how each household's rent will be set in the first year; how frequently rents will change and by what amount; and how the stepped rent will end (i.e., what is the maximum rent).</p> <p>The Stepped Rent policy will increase tenant rents annually by an amount unrelated to each household's income. The annual stepped rent increase will be a specific dollar amount, by unit size. Housing Connect plans to set rent increases at 2% of Fair Market Rent based on unit size and leave it fixed for the 6-year study period. For households with 5 bedrooms and larger subsidies, Housing Connect will have an annual step increase of less than 2% of FMR to accommodate larger households and prevent a negative financial impact.</p>

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Housing Connect's annual step increases are as follows:

0 Bedroom: \$19
1 Bedroom: \$23
2 Bedroom: \$27
3 Bedroom: \$37
4 Bedroom: \$42
5+ Bedroom: \$48

Current households will start out paying rent equal to 30% of their total retrospective annual adjusted income or a minimum rent of \$50 (whichever is larger). After year 1, each household's rent will increase by the established amount (with exceptions for hardships).

New admission households will start out paying rent equal to 30 percent of their total current adjusted income or a minimum rent of \$50 (whichever is larger). After year 1, each household's rent will increase by the established amount (with exceptions for hardships). At the triennial income reexamination, Housing Connect will document household income and any changes in household composition. However, the triennial income reexamination will not affect the household's rent. At the triennial income reexamination, Housing Connect will document household income and any changes in household composition. However, the triennial income reexamination will not affect the household's rent.

A household will receive a hardship if their rent burden exceeds 40% of their current/anticipated total annual adjusted income and for other circumstances outlined in our Hardship Policy. The hardship rent will equal 40% of the household's current/anticipated total annual adjusted income. The hardship rent will last for 12 months and can be renewed as needed. More detail is available in our attached Hardship Policy.

If a Public Housing household's income is over the income limit at the first recertification following study enrollment or at a subsequent triennial eligibility check, the standard over-income procedures are triggered. PHA measures income the following year. Over-income rent rules supersede the stepped rent policy. The "last step" in public housing is when the household's TTP reaches the flat rent.

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Please upload a document that presents the stepped rent schedule in the form of a table.

This document is attached.

If a household progresses all the way through the stepped rent schedule, what will their status be?

Other\Not Applicable. [If checked]: Please explain

Standard over-income rules in PH will apply if the family is paying the flat rent at the end of the stepped rent schedule.

1.d. - Stepped Rent (HCV)

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

HC was approved for this waiver in its FY 2022-2023 MTW Supplement, implementation began 9/1/2023 and will continue through 8/31/2024. As part of the cohort-specific Rent Reform study, Housing Connect will implement a stepped rent model for qualified Housing Choice Voucher (HCV) households as outlined by HUD in the Stepped Rent Policy.

The rent model will increase the family's rent payment/TTP on a fixed schedule in both frequency and amount. The fixed schedule/stepped rent model will be disaggregated from family income allowing a family to keep more of their increased income therefore giving incentives to working families and providing opportunities to increase their self-sufficiency.

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

Cost effectiveness; Self-sufficiency

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

Neutral (no cost implications)
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>New admissions and currently assisted households</p>
<p>Does the MTW activity apply to all family types or only to selected family types?</p> <p>The MTW activity applies only to selected family types</p>
<p>Please select the family types subject to this MTW activity.</p> <p>Other – another specifically defined target population or populations.</p>
<p>If Other Selected in Previous Question: Please describe this target population in the text box.</p> <p>All non-elderly, non-disabled households currently or newly receiving a HCV subsidy that do not meet any of the exclusion criteria are eligible for enrollment into the STRD study.</p>
<p>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p> <p>The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers</p>
<p>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</p> <p>This MTW activity applies to the following housing choice voucher unit types: All tenant-based units and/or properties with project-based vouchers (PBVs) with the exception of PBVs in Permanent Supportive Housing (PSH). Households in PBVs in PSH require essential supportive services and have met specific eligibility criteria attached with the PBV. Details regarding eligibility criteria for Permanent Supportive Housing can be found in Housing Connect's Administrative Plan.</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>Implementation began 9/1/2023 and continues in accordance with approved policies. To date, HC has processed and approved 77 hardships in accordance with policies, 24 additional hardship have been requested and denied based on unmet approval criteria.</p>
<p>Does this MTW activity require a hardship policy?</p> <p>Provided Already</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Does the MTW activity require an impact analysis?</p> <p>Provided Already</p>
<p>Describe how the stepped rent is structured, including the following: how each household's rent will be set in the first year; how frequently rents will change and by what amount; and how the stepped rent will end (i.e., what is the maximum rent).</p> <p>The Stepped Rent policy will increase tenant rents annually by an amount unrelated to each household's income. The</p>

annual stepped rent increase will be a specific dollar amount, by unit size. Housing Connect plans to set rent increases at 2% of Fair Market Rent based on unit size and leave it fixed for the 6-year study period. For households with 5 bedrooms and larger subsidies, Housing Connect will have an annual step increase of less than 2% of FMR to accommodate larger households and reduce a negative financial impact.

Housing Connect's annual step increases are as follows:

0 Bedroom: \$19
1 Bedroom: \$23
2 Bedroom: \$27
3 Bedroom: \$37
4 Bedroom: \$42
5+ Bedroom: \$ 48

Current households will start out paying rent equal to 30% of their total retrospective annual adjusted income or a minimum rent of \$50 (whichever is larger). After year 1, each household's rent will increase by the established amount (with exceptions for hardships and triennial income reexaminations).

New admission households will start out paying rent equal to their total current adjusted income or a minimum rent of \$50 (whichever is larger). After year 1, each household's rent will increase by the established amount (with exceptions for hardships and triennial income reexaminations).

At the triennial income reexamination, Housing Connect will document household income and any changes in household composition. However, the triennial income reexamination will not affect the household's rent.

A household will receive a hardship if their rent burden exceeds 40% of their current/anticipated total adjusted income and for other circumstances outlined in our Hardship Policy. The hardship rent will equal 40% of the household's current/anticipated total annual adjusted income. The hardship rent will last for 12 months and can be renewed as needed. More detail is available in our attached Hardship Policy.

If an HCV household's current gross income is over 120% of AML at the first recertification following study enrollment or at a subsequent triennial eligibility check, this designates the household as zero-HAP. The household gets a 180-day zero HAP grace period. At the end of that grace period, the household exits the voucher program. However, if the zero-HAP rent (or a loss of income) causes a rent burden above 40% of current gross income, the household can request and receive a hardship. A hardship would halt the HCV termination process.

Please upload a document that presents the stepped rent schedule in the form of a table.

This document is attached.

If a household progresses all the way through the stepped rent schedule, what will their status be?

Other\Not Applicable. [If checked]: Please explain

At the end of the stepped rent schedule the 180 day-rule of zero HAP will apply and the family will be terminated/graduated from the program at the end of the 180-day period. If the family is not paying the full contract rent, they will continue to receive a subsidy.

1.i. - Alternative Utility Allowance (PH)

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

HC was approved for this waiver in its FY 2022-2023 MTW Supplement and implementation has commenced. Housing Connect modified the utility allowance by calculating by bedroom size as opposed to building type. The utility allowance will be calculated based on the number of bedrooms in the unit or the voucher size, whichever is lower. The change in calculation simplified the process for households seeking housing options to determine if the unit is affordable and eliminated the processing burden for Housing Connect's staff of determining the utility allowance

amount for a specific unit.

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

Cost effectiveness
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Decreased revenue
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies to all assisted households
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. The Alt UA began implementation in February 2023.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
Please describe the alternative method of calculating the utility allowances. Please explain how the method of calculating utility allowances is different from the standard method and what objective the MTW agency aims to achieve by using this alternative method. The utility allowance is based on utility surveys and analysis of the type of structure, bedroom size appliances provided by the tenant, and type of appliances (gas/electric). The simplified schedule is based on the analysis of data collected from HC's existing portfolio including the most common structure and utility types. This new utility allowance schedule will be used and implemented at new admission, change of unit, or upon the annual or triennial certification. HC has provided an impact analysis to demonstrate impact.

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1.j. - Alternative Utility Allowance (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative Housing Connect was approved for this waiver in its FY 2022-2023 MTW Supplement and implementation has commenced. Housing Connect modified the utility allowance by calculating by bedroom size as opposed to building type. The utility allowance will be calculated based on the number of bedrooms in the unit or the voucher size, whichever is lower. The change in calculation will simplify the process for households seeking housing options to determine if the unit is affordable and it will eliminate the processing burden for Housing Connect's staff of determining the utility allowance amount for a specific unit.
Which of the MTW statutory objectives does this MTW activity serve? Cost effectiveness
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Neutral (no cost implications)
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies to all assisted households
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. Implementation began in 3/1/2023. Consistent with approved policies Housing Connect offers a phase in of the Alt UA

based on household criteria. To date, 122 households are benefitting from the phase in policy.

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

No

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

The utility allowance is based on utility surveys and analysis of the type of structure, bedroom size appliances provided by the tenant, and type of appliances (gas/electric). The simplified schedule is based on the analysis of data collected from HC's existing portfolio including the most common structure and utility types. This new utility allowance schedule will be used and implemented at new admission, change of unit, or upon the annual or triennial certification. HC has provided an impact analysis to demonstrate impact.

1.v. - Alternative Income Inclusions/Exclusions (PH)

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

Housing Connect intends to exclude asset income up to \$50,000 when calculating tenant rent. This income exclusion will apply to all public housing households. HC's goals for this activity include simplifying program administration and reducing administrative burden.

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

Cost effectiveness; Self-sufficiency

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

n/a

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

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

Income to be excluded includes Asset Income up to \$50,000

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

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

Housing Connect intends to exclude asset income up to \$50,000 when calculating tenant rent. This income exclusion applies to all HCV households. HC's goals for this activity includes simplifying program administration and reducing administrative burden.

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

Cost effectiveness; Self-sufficiency

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

n/a

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

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

Income to be excluded includes Asset Income up to \$50,000

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

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

HC was approved for the following Safe Harbor Waiver 2.b.2.i Payment standard must be between 80% - 120% of the FMR in its FY 23-24 MTW Supplement. This activity waives provisions of HUD 24 CFR 982.503 (b)(1) sections (v-vi) and PIH Notice 2018-18 and successor notices to allow Housing Connect (HC) to utilize an MTW reasonable accommodation (RA) exception payment standard (PS) without consideration for the 120% Fair Market Rent (FMR) limitation and without prior HUD approval, while ensuring that any approved rent meets the rent reasonableness standard (up to 150%). HC utilizes this MTW RA exception PS to assist families with disabled individuals in finding affordable units that include the features needed to address their disabilities. This policy will improve housing choice and reduce administrative burdens to benefit both clients and the agency. This policy improves housing choice and reduces administrative burdens to benefit both clients and the agency. HC has budgeted funds to cover the cost of the MTW RA exception PS and understands that application of this policy will not cause any hardship to HCV families.

As application an MTW RA exception PS will assist households with disabled members in finding affordable units, it is not projected to create any hardship for HCV applicants or participants HCV program applicants and participants may request an informal review/hearing when and if their request for a reasonable accommodation exception payment standard is

denied. HC will follow its applicable policies on reviews/hearings.

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

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on

what you know today.

Increased expenditures

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

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Housing Connect is pleased to support households in finding and leasing an appropriate unit based upon their disability related needs. The ability to approve a unit up to 150% of FMR with proper documentation expedites the leasing process and ensures a greater likelihood of housing stability. To date, HC has utilized this flexibility with 1 household.

Does this MTW activity require a hardship policy?

No

No document is attached.

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

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

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This activity will waive provisions of HUD 24 CFR 982.503 (b)(1) sections (v-vi) and PIH Notice 2018-18 and successor notices to allow Housing Connect (HC) to utilize an MTW reasonable accommodation (RA) exception payment standard (PS) without consideration for the 120% Fair Market Rent (FMR) limitation and without prior HUD approval, while ensuring that any approved rent meets the rent reasonableness standard (up to 150%).

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

No

Please explain the payment standards by FMR:

HC will utilize this flexibility in conjunction with a reasonable accommodation (RA) exception payment standard (PS) without consideration for the 120% Fair Market Rent (FMR) limitation and without prior HUD approval, while ensuring that any approved rent meets the rent reasonableness standard (up to 150%).

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

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

HC was approved for this waiver in its FY 2022-2023 MTW Supplement, and implementation has commenced. HC will use MTW flexibility to eliminate the requirement for a third party to conduct rent reasonableness on HC-owned or HC-controlled units assisted with project-based or tenant-based vouchers. HC previously had a third party determine rent reasonableness on HC units, despite the fact that many of these units are subject to rent restrictions due to other funding sources such as RAD PBV rent restrictions. HC incurs cost and additional staff time to have these determinations done by a third party.

HC implements this activity within the safe harbor limits established by the MTW Operations including the following: HC will establish and make available a quality assurance method to ensure impartiality. HC will make available the method used to determine that rents charged by owners to voucher participants are reasonable when compared to similar unassisted units in the market area. As needed and by Department request, HC will obtain services of a third-party entity to determine rent reasonableness for PHA-owned units. This waiver is part of HC's overall goals to use MTW flexibility to streamline and reduce costs.

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

Cost effectiveness

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Staff are able to utilize this flexibility as needed to streamline processes and reduce administrative burden.

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

No

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

For quality assurance, HC's rent reasonable process includes using rent comparables generated by the third party company AffordableHousing.com to identify comparable units. Rent reasonableness determinations will be performed by an HC staff person who is trained on HCV and PBV rent reasonableness regulations. To ensure the consistency and uniformity of these determined Rent Reasonables for a particular unit, HC supervisory staff shall perform quality control (QC) reviews on a random sample of completed Rent Reasonable's in accordance with the policies described in the Administrative Plan and consistent with SEMAP QC protocol. This process will be performed on all units including

HC-owned or HC-controlled units assisted with project-based or tenant-based vouchers.

This document is attached.

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

HC uses the third party company AffordableHousing.com (formerly GoSection8) to generate rent comparables for the HCV and PBV programs. The AffordableHousing.com software generates a minimum of 3 unassisted rent comparables for the subject unit, matching the unit characteristics and taking into account the location, size, type, quality, amenities, facilities, and the management and maintenance of each unit; this approach is similar to that used by property appraisers, and

determines if the owner's requested rent is reasonable. A unit that does not meet Rent Reasonableness using the method above will be denied unless an adjustment is made to the rent amount in order to be subsidized.

No document is attached.

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

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

Housing Connect was approved for this waiver in its FY 2022-2023 MTW Supplement. HC is currently implementing triennial reexaminations for non-elderly and non-disabled PH households in the treatment group for the stepped rent study. Triennial reexaminations will result in a reduction in staff collecting, verifying, and processing data. Streamlined reexaminations will also save tenants/participants time and cost in regards to complying with the annual recertification documentation requirements. The anticipated outcome from this change is that families will have an incentive to increase their income as they will be able retain 100% of their additional earnings versus paying 30% of those earnings towards rent.

HC was also approved in its FY 2023-2024 MTW Supplement to expand this flexibility to Elderly and Disabled households who are excluded from the stepped rent study. HC is in planning stages for this expansion. HC will phase in the triennial reexamination frequency over a three-year period. One third of the elderly/disabled households will be recertified in year one, one-third in year 2 and the remaining third in year 3. In this way the financial impact will be spread over the implementation period. After implementation, all new elderly/disabled households will be placed immediately on a triennial reexamination frequency.

As part of this expansion HC has included an additional Hardship Policy and Impact Analysis specific to the Elderly/Disabled group of households. HC projects that this policy will have a positive impact on affordability of housing costs in that increases in income will be deferred for three years; however, decreases in income will be still processed through interim reexaminations.

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HC will update payment standards for increases in contract rent which occur between triennial reexaminations at interims.

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

Cost effectiveness; Self-sufficiency

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

Neutral (no cost implications)

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families; Elderly families; Disabled families (to the extent those families are not exempt via a

reasonable accommodation)

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Implementation began 9/1/2023 and continues in accordance with approved policies specific to Stepped Rent.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

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

Yes

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

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

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

No

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

No hardship were requested in the most recent fiscal year.

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

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

The waiver was previously approved. The standard MTW waiver provides that when an alternative reexamination schedule is established, the housing authority must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased by 10% or more. Instead, HC is proposing that households can request a hardship exemption under HC's Hardship Policy that will address a decrease in income or a rent burden above 40% of a household's current monthly adjusted income. This safe harbor waiver flexibility is limited to households participating in the Stepped Rent study.

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

Yes

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

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

What is the recertification schedule?

Once every three years

How many interim recertifications per year may a household request?

1

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

In accordance with policies established for the Rent Reform demonstration, families who are selected for the treatment group of the Stepped Rent policy will have triennial re-examinations. Changes in family/household circumstances under the alternative reexamination schedule will be addressed with the Stepped Rent Hardship Policy in lieu of an interim reexamination.

For Elderly/Disabled households who are excluded from the rent study but who are eligible for triennial reexaminations, they will be eligible for one interim adjustment for a reduction in income and have access to a hardship request as needed.

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

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

Housing Connect was approved for this waiver in its FY 2022-2023 MTW Supplement. HC is currently implementing triennial reexaminations for non-elderly and non-disabled HCV households in the treatment group for the stepped rent study. Triennial reexaminations will result in a reduction in staff collecting, verifying, and processing data. Streamlined reexaminations will also save tenants/participants time and cost in regards to complying with the annual recertification documentation requirements. The anticipated outcome from this change is that families will have an incentive to increase their income as they will be able retain 100% of their additional earnings versus paying 30% of those earnings towards rent.

HC was also approved in its FY 2023-2024 MTW Supplement to expand this flexibility to Elderly and Disabled households who are excluded from the stepped rent study. HC is in planning stages for this expansion. HC will phase in the triennial reexamination frequency over a three-year period. One third of the elderly/disabled households will be recertified in year one, one-third in year 2 and the remaining third in year 3. In this way the financial impact will be spread over the implementation period. After implementation, all new elderly/disabled households will be placed immediately on a triennial reexamination frequency.

As part of this expansion HC has included an additional Impact Analysis specific to the Elderly/Disabled group of households. HC projects that this policy will have a positive impact on affordability of housing costs in that increases in income will be deferred for three years; however, decreases in income will be still processed through interim reexaminations.

HC will update payment standards for increases in contract rent which occur between triennial reexaminations at interims.

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

Cost effectiveness; Self-sufficiency
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Neutral (no cost implications)
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies only to a subset or subsets of assisted households
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? New admissions and currently assisted households
Does the MTW activity apply to all family types or only to selected family types? The MTW activity applies only to selected family types
Please select the family types subject to this MTW activity. Non-elderly, non-disabled families; Elderly families; Disabled families (to the extent those families are not exempt via a reasonable accommodation)
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity. Households in PBVs in non PSH are eligible for this flexibility through enrollment into the Stepped Rent study. Excluded households in PBV's are also eligible along with households in PBVs in Permanent Supportive Housing.
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. Implementation began 9/1/2023 and continues in accordance with approved policies specific to Stepped Rent.
Does this MTW activity require a hardship policy? Provided Already
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? Yes
What is the status of the Safe Harbor Waiver request? The waiver was previously approved.
Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity. The standard MTW waiver provides that when an alternative reexamination schedule is established, the housing authority must allow at least one interim adjustment per year at the request of the household, if the household gross income has

decreased by 10% or more.

Instead, HC is proposing that households can request a hardship exemption under HC's Hardship Policy that will address a decrease in income or a rent burden above 40% of a household's current monthly adjusted income. This safe harbor flexibility is limited to households participating in the Stepped Rent study.

Does the MTW activity require an impact analysis?

Provided Already

What is the recertification schedule?

Once every three years

How many interim recertifications per year may a household request?

1

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

In accordance with policies established for the Rent Reform demonstration, families who are selected for the treatment group of the Stepped Rent policy will have triennial re-examinations. Changes in family/household circumstances under the alternative reexamination schedule will be addressed with the Stepped Rent Hardship Policy in lieu of an interim reexamination.

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For Elderly/Disabled households who are excluded from the rent study but who are eligible for triennial reexamination, they will be eligible for one interim adjustment for a reduction in income and have access to a hardship request as needed.

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

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

HC was approved for this waiver in its FY 2022-2023 MTW Supplement, and implementation has commenced. Self-Certification of Assets will allow families to self-certify assets received up to \$50,000 at admission and recertification. Housing Connect will decrease the reporting burden on families by no longer requesting bank statements, or verifying stocks and bonds, \$50,000 or less. This change significantly reduces Housing Connect's staff administrative burden in collecting and processing data and eliminates the tenant/participant having to pay the bank charges for bank statements.

This activity allows for greater cost effectiveness.

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

Cost effectiveness

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Staff utilize this flexibility as needed to streamline processes and reduce administrative burden.

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

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

The waiver was previously approved. Allows HC to implement this flexibility at new admissions as well as at reexaminations.

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

\$50,000.

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

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

HC was approved for this waiver in its FY 2022-2023 MTW Supplement, and implementation has commenced. Self-Certification of Assets allows families to self-certify assets received up to \$50,000 at admission and recertification. Housing Connect will decrease the reporting burden on families by no longer requesting bank statements, or verifying stocks and bonds, \$50,000 or less. This change significantly reduces Housing Connect's staff administrative burden in collecting and processing data and eliminate the tenant/participant having to pay the bank charges for bank statements.

This activity will allow for greater cost effectiveness.

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

Cost effectiveness

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Staff utilize this flexibility as needed to streamline processes and reduce administrative burden.

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver was previously approved.

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

The waiver was previously approved. Allows HC to implement this flexibility at new admissions as well as at reexaminations.

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

\$50,000.

4.a. - Vacancy Loss (HCV-Tenant-based Assistance)

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

HC was approved for this waiver in its CY 2024 MTW Supplement. This activity waives provisions of section 8(o)(9) of the 1937 Act, and 24 CFR 982.311 and 982.352(c) to incentivize landlords' continued participation in the HCV program by authorizing HC to make vacancy loss payments if a HCV landlord subsequently leases the vacated unit to another HC-assisted participant.

HC's policies related to vacancy loss payments and other landlord incentives will be updated and described in the Administrative Plan. Once notified of a vacancy by an HC-assisted tenant, HC will provide the landlord with information regarding the vacancy claim request process and eligibility requirements. If the landlord subsequently leases the unit to another HC-assisted participant then, upon execution of the new lease and Housing Assistance Payment (HAP) contract between the landlord and HC, HC will provide a vacancy loss payment to the landlord. Vacancy loss payments will not exceed one month of the contract rent that was in effect at the time that the prior tenant vacated the unit.

The goal of this activity is to incentivize landlords to continue their participation in the HCV program and to maintain the availability of units. The vacancy loss payments will offer compensation when landlords keep units available during the RFTA and inspection process and also encourage landlords to seek out additional voucher tenants rather than relying on the open market. The vacancy loss payments are part a larger landlord incentives initiative to increase the supply of affordable housing, maintain quality landlords and units, and increase housing options.

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

Housing choice

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

Increased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies to all family types

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

The MTW activity applies to all tenant-based units
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. n/a
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
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 a low-poverty neighborhood, or units/landlords new to the HCV program?) To all units
What is the maximum payment that can be made to a landlord under this policy? Vacancy loss payments will not exceed one month of the contract rent that was in effect at the time that the prior tenant vacated the unit.
How many payments were issued under this policy in the most recently completed PHA fiscal year? 0
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year? \$0

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4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)
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 HC was approved for the activity in its CY 2024 MTW Supplement. This activity waives provisions of section 8(o)(9) of the 1937 Act, and 24 CFR 982.311 and 982.352(c) to encourage landlords to participate in the HCV program by providing leasing incentives to make unit(s) available for lease by HCV participants. The following leasing incentives will be made available to participating and qualifying landlords, as applicable.
1. Signing Bonus Payment: Landlords who participate in the HCV program by renting their unit to a HC-assisted tenant for the first time will be eligible for a "new landlord bonus payment." The amount of bonus payment shall not exceed one month of the approved contract rent for the unit. The payment will be made to the landlord when the HAP contract is executed between the landlord and HC and along with the first month's rent payment to the landlord.
2. Unit Hold Incentive Payment: Unit hold incentive payments will be made available to landlords who lease a unit that was previously occupied by a non-subsidized tenant to a HC HCV participant.
Upon successful execution of the lease and HAP contract between the landlord and HC, the landlord will be eligible for the unit hold incentive payment to account for the time the unit was vacant while the leasing paperwork and inspection were in process. The amount of bonus payment shall not exceed one month of the approved contract rent for the unit. The payment will be made to the landlord when the HAP contract is executed between the landlord and HC and along with the first month's rent payment to the landlord.
Landlords may be eligible to receive one or more leasing incentives for which they qualify under MTW Activities 4.a. and/or 4.c. The landlord may receive the maximum of one month's contract rent per each leasing incentive for which they qualify, as approved by HC.
Which of the MTW statutory objectives does this MTW activity serve?

Housing choice
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Increased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies only to a subset or subsets of assisted households
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? New admissions and currently assisted households
Does the MTW activity apply to all family types or only to selected family types? The MTW activity applies to all family types
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? The MTW activity applies to all tenant-based units
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. n/a
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
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 a low-poverty neighborhood, or units/landlords new to the HCV program?) To all units
What is the maximum payment that can be made to a landlord under this policy? The landlord may receive the maximum of one month's contract rent per each leasing incentive for which they qualify, as approved by HC.
How many payments were issued under this policy in the most recently completed PHA fiscal year? 0
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year? \$0

5.a. - Pre-Qualifying Unit Inspections (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative HC was approved for this waiver in its FY 2022-2023 MTW Supplement, and implementation has commenced. Housing

Connect allows pre-qualifying unit inspections (also known as a pre-inspection) with the goal to increase cost effectiveness by expediting the lease-up process. The pre inspection may be conducted within 90 days of the participant occupying the unit. An interim inspection will be made available based on need/request and HQS standards will not be altered.

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

Cost effectiveness; Housing choice

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Staff utilize this flexibility as needed to streamline processes and reduce administrative burden.

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

No

How long is the pre-inspection valid for?

The pre-inspection is valid for 90 days.

DRAFT

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

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

HC was approved for this waiver in its FY 2022-2023 MTW Supplement, and implementation has commenced. Under this activity HC is authorized to perform NSPIRE inspections on PBV units that it owns, manages, and/or controls.

All such inspections will be conducted using standards found at 24 CFR 982.401 (or corresponding successor standards i.e. NSPIRE).

To ensure the consistent and uniform application of inspections standards, HC supervisory staff will conduct quality control inspections on a random sample of units in accordance with the established Inspection Quality Assurance Method.

Program participants may request an interim inspection by contacting HC in accordance with the policies described in this Plan.

If requested by HUD, HC will obtain the services of a third-party entity to determine if HC owned units pass inspections standards.

Please note special requirements for HC-owned PBVs that are awarded pursuant to MTW Waiver 9.c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV):

-The initial pre-selection NSPIRE inspection(s) for these properties/units must be performed by an independent entity, and are not subject to MTW Waiver 5.c. detailed above.

-Ongoing inspections (i.e. inspections occurring after the initial PBV award) of these properties/units may utilize MTW Waiver 5.c. and waive the requirement for a third-party to conduct the inspection, allowing HC to conduct inspections on

<p>HC-owned PBV units.</p> <p>This activity helps support the HC goal to streamline program administration and promote timely lease-up of PBV units.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Neutral (no cost implications)</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>Staff utilize this flexibility as needed to streamline processes and reduce administrative burden.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Please explain or upload the description of the quality assurance method:</p> <p>Following will explain the quality assurance method</p> <p style="text-align: center; font-size: 2em; font-weight: bold;">DRAFT</p> <p>This document is attached.</p>

<p>9.a. - Increase PBV Program Cap (HCV)</p>
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>HC was approved for this waiver in its FY 2022-2023 MTW Supplement, and implementation has commenced. HC has approved up to 35% of authorized HCV units to be project based. This increase and flexibility will support the development of Permanent Supportive Housing (PBV) properties and increase housing choice in underserved parts of Salt Lake County, including areas of opportunity.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Housing choice</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Neutral (no cost implications)</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about</p>

what has been accomplished or changed during the implementation.

As needed and applicable, this increase and flexibility will support the development of Permanent Supportive Housing (PBV) properties and increase housing choice in underserved parts of Salt Lake County, including areas of opportunity.

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

No

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

35.00%

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

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

HC was approved for this waiver in its FY 2022-2023 MTW Supplement, and implementation will commence as applicable. Under this activity, HC may eliminate or raise the existing cap on the number of units within a project and allow up to 100% of units in a project to be placed under a PBV Housing Assistance Payments contract. HC may eliminate or raise the project cap for those PBV projects that the agency determines to be consistent with the goal of increasing housing choice for Housing Choice Voucher program participants. HC may eliminate or raise the project cap for projects located in Salt Lake County including but not limited to underserved areas and areas of opportunity. HC will continue to be subject to the applicable provisions of PIH Notice 2013-28 or successor notices. This activity supports the goal of increasing housing choice.

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

Housing choice

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Housing Connect will utilize this flexibility as needed with the development of affordable housing that includes Project Based Vouchers.

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

No

9.c. - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)

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

HC was approved for this waiver in its FY 2022-2023 MTW Supplement, and implementation will commence as applicable. Under this activity, Housing Connect will eliminate the selection process in the award of PBV's to properties owned by

Housing Connect that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site. Housing Connect's goal for this request is to increase cost effectiveness by eliminating this process and increase housing choice.

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

Cost effectiveness; Housing choice

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Housing Connect will utilize this flexibility as needed with the development of applicable affordable housing.

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

No

10.d.PH - Modify or Eliminate the Contract of Participation (PH)

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

HC was approved for this waiver in its FY 2022-2023 MTW Supplement, implementation commenced 5/1/2024.

HC intends to use MTW flexibility to enhance our existing Family Self-Sufficiency (FSS) Program, which will continue to be funded through the HUD FSS competition. FSS participants enrolled in our MTW Enhanced FSS Program will utilize a locally developed agreement/contract in lieu of the standard FSS Contract of Participation (COP) (HUD-52650) that codifies the terms of participation. These terms will encourage participation and successful completion of the program. Main tenants of the MTW Enhanced Program and/or specific changes to be outlined in the local agreement include, but are not limited to:

- Eliminating the traditional FSS escrow calculation and replacing it with a Pay Points system, whereby participants earn escrow credits by completing goals, each of which has an escrow payment value. Pay points accrue on the first day of the month following verification of completion of an established milestone; For example, if a milestone was verified on February 15, the pay points would accrue on March 1;
- Preparing local versions of the Contract of Participation and Individual Training and Services Plans to reflect HC's FSS program enhancements and changes;
- All MTW FSS contracts will have an end date 5 years from the enrollment date to ensure that households with biannual or triennial recertifications have the same length of participation as those who receive regular annual and interim recertifications.
- Current FSS participants will be given the option of completing their FSS COP under the traditional or Final Rule FSS programs or converting their participation to the MTW Enhanced FSS program. Existing participants who convert to the MTW Enhanced FSS program will retain any previously accrued escrow.
- Housing Connect will have all modifications outlined in an approved FSS Action Plan in accordance with 24 CFR 984.201 through Housing Connect's MTW planning process.. Housing Connect will be implementing this activity within the safe harbor limits established by the MTW operations notice.

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

Self-sufficiency

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Housing Connect began implementation on 5/1/2024 based on approved policies.

Does this MTW activity require a hardship policy?

No

No document is attached.

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

No

Does the MTW activity require an impact analysis?

No

No document is attached.

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10.d.HCV - Modify or Eliminate the Contract of Participation (HCV)

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

HC was approved for this waiver in its FY 2022-2023 MTW Supplement, implementation commenced 5/1/2024.

HC intends to use MTW flexibility to enhance our existing Family Self-Sufficiency (FSS) Program, which will continue to be funded through the HUD FSS competition. FSS participants enrolled in our MTW Enhanced FSS Program will utilize a locally developed agreement/contract in lieu of the standard FSS Contract of Participation (COP) (HUD-52650) that codifies the terms of participation. These terms will encourage participation and successful completion of the program. Main tenants of the MTW Enhanced Program and/or specific changes to be outlined in the local agreement include, but are not limited to:

- Eliminating the traditional FSS escrow calculation and replacing it with a Pay Points system, whereby participants earn escrow credits by completing goals, each of which has an escrow payment value. Pay points accrue on the first day of the month following verification of completion of an established milestone; For example, if a milestone was verified on February 15, the pay points would accrue on March 1;
- Preparing local versions of the Contract of Participation and Individual Training and Services Plans to reflect HC's FSS program enhancements and changes;
- All MTW FSS contracts will have an end date 5 years from the enrollment date to ensure that households with biannual or triennial recertifications have the same length of participation as those who receive regular annual and interim recertifications.
- Current FSS participants will be given the option of completing their FSS COP under the traditional or Final Rule FSS programs or converting their participation to the MTW Enhanced FSS program. Existing participants who convert to the MTW Enhanced FSS program will retain any previously accrued escrow.
- Housing Connect will have all modifications outlined in an approved FSS Action Plan in accordance with 24 CFR 984.201 through Housing Connect's MTW planning process.. Housing Connect will be implementing this activity within the safe harbor limits established by the MTW operations notice.

<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Self-sufficiency</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Neutral (no cost implications)</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>Housing Connect began implementation on 5/1/2024 based on approved policies.</p>
<p>Does this MTW activity require a hardship policy?</p> <p>No</p> <p>No document is attached.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Does the MTW activity require an impact analysis?</p> <p>No</p> <p>No document is attached.</p>

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<p>10.e.PH - Policies for Addressing Increases in Family Income (PH)</p>
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>HC was approved for this waiver in its FY 2022-2023 MTW Supplement, implementation commenced on 5/1/2024.</p> <p>HC modifications include giving increased incentives to families whose heads of household are working, seeking work, participating in job training, educational or other self-sufficiency milestones. Housing Connect will eliminate the traditional FSS escrow calculation and replace it with a Pay Points system, whereby participants earn escrow credits by completing goals, each of which has an escrow payment value.</p> <p>Housing Connect has adopted the Social Determinants of Health as a core framework to focus current and future activities, initiatives, and housing development efforts. The Pay Points system prioritizes Housing Stability, Financial Health, Food Quality & Stability, Education Connection, Health Access & Connection, and Community Connection. Collectively, the priority determinants identify the holistic impact Housing Connect seeks to make for those served.</p> <p>Housing Connect understands that self-sufficiency looks different for each household. HC ensures residents can maintain assisted housing and have support and resources to successfully move out of assisted housing where appropriate.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Self-sufficiency</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p>

Neutral (no cost implications)
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>Housing Connect began implementation on 5/1/2024 based on approved policies.</p>
<p>Does this MTW activity require a hardship policy?</p> <p>No</p> <p>No document is attached.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Does the MTW activity require an impact analysis?</p> <p>No</p> <p>No document is attached.</p>
<p>How will the MTW agency treat increased earnings for families participating in the FSS Program with MTW flexibility?</p> <p>Housing Connect's MTW Enhanced FSS program will eliminate the traditional FSS escrow calculation. Increases in income will not be factored into the escrow calculation and will not automatically result in escrow accrual. Instead, households will have the opportunity to earn escrow through the completion of program milestones called Pay Points. Households will earn cash incentives for achieving specific pre-established self-sufficiency milestones. Cash incentives will be held in an escrow account and will be available for interim disbursement or at the successful completion of the program.</p>

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10.e.HCV - Policies for Addressing Increases in Family Income (HCV)
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>HC was approved for this waiver in its FY 2022-2023 MTW Supplement, implementation commenced 5/1/2024.</p> <p>HC modifications include giving increased incentives to families whose heads of household are working, seeking work, participating in job training, educational or other self-sufficiency milestones. Housing Connect will eliminate the traditional FSS escrow calculation and replace it with a Pay Points system, whereby participants earn escrow credits by completing goals, each of which has an escrow payment value.</p> <p>Housing Connect has adopted the Social Determinants of Health as a core framework to focus current and future activities, initiatives, and housing development efforts. The Pay Points system prioritizes Housing Stability, Financial Health, Food Quality & Stability, Education Connection, Health Access & Connection, and Community Connection. Collectively, the priority determinants identify the holistic impact Housing Connect seeks to make for those served.</p> <p>Housing Connect understands that self-sufficiency looks different for each household. HC ensures residents can maintain assisted housing and have support and resources to successfully move out of assisted housing where appropriate.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p>

Self-sufficiency
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Neutral (no cost implications)</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>Housing Connect began implementation on 5/1/2024 based on approved policies.</p>
<p>Does this MTW activity require a hardship policy?</p> <p>No</p> <p>No document is attached.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Does the MTW activity require an impact analysis?</p> <p>No</p> <p>No document is attached.</p>
<p>How will the MTW agency treat increased earnings for families participating in the FSS Program with MTW flexibility?</p> <p>Housing Connect's MTW Enhanced FSS program will eliminate the traditional FSS escrow calculation. Increases in income will not be factored into the escrow calculation and will not automatically result in escrow accrual. Instead, households will have the opportunity to earn escrow through the completion of program milestones called Pay Points. Households will earn cash incentives for achieving specific pre-established self-sufficiency milestones. Cash incentives will be held in an escrow account and will be available for interim disbursement or at the successful completion of the program.</p>

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17.c. - Housing Development Programs
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>Under this activity, HC may utilize MTW funding to acquire, renovate and/or build affordable housing units that are not public housing for low-income families including housing that meets HUD requirements for MTW "local, non-traditional housing" as defined in HUD PIH Notice 2011-45 or successor notices. HC may utilize this activity to provide gap financing (grants or loans) to affordable housing developments including, but not limited to, PBV developments, Low Income Housing Tax Credit developments and/or other eligible development activities, subject to approval by the HC Board of Commissioners. HC may expend MTW funds including Public Housing Operating or Capital Funds, Housing Assistance Payments and/or HCV Administrative Fee reserves on such activities provided that HC shall not expend more than 10% of its Housing Assistance Payments budget on local, non-traditional activities including this housing development activity.</p> <p>In implementing this activity, HC shall: 1) ensure that families assisted meet the HUD definition of "low-income"; 2) comply with PIH Notice 2011-45 as applicable; 3) comply with Section 30 of the US Housing Act of 1937; and, 4) Competitively bid any MTW funding awarded through this activity to a third-party provider. HC has provided summary information on one potential project for funding under this activity; however other projects may also be considered subject to approval of the HC Board of Commissioners.</p>

This activity supports the goals to increase housing choices for low-income households and to leverage additional funds for affordable housing development.

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

Cost effectiveness; Housing choice

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

Neutral (no cost implications); Increased revenue

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

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Construction began in the Fall of 2022 on a LIHTC development of 89 units of affordable housing including 36 units with PBV's; this development replaced 24 units of Public Housing. The development was complete in January 2024 and occupancy began February 2024 and was fully occupied by June 1, 2024.

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

No

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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 - 50% 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 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 - 50% 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 - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
			0.00	0.00	0.00	0.00	0.00	0.00
East 72 (Formally Sunset Gardens)	New Construction	Gap Financing	89.00	89.00	0.00	71.00	18.00	0.00

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 - 50% 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	<p>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</p> <p>Yes, the Safe Harbor Waiver request(s) for 1v, 1w, 2b, 3a, 3b, 3c, 3d is(are) attached.</p>

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</p> <p>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p>No</p>

Agency-Specific Waiver(s) for which HUD Approval has been Received:

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

Yes

Title	Has there been a change in how the waiver is being implemented from when it was originally approved?	Please provide a description of what has changed.	Please provide a description of the final outcomes and lessons learned from implementing this Activity at your PHA.	If the MTW Agency was previously required to prepare an impact analysis, was a final impact analysis prepared at the time of discontinuation?
Alternative Verification Hierarchy	Yes			

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	Alternative Verification Hierarchy	Yes	<p>Current language reads, "For tenants and participants, verifications for reexaminations may not be more than 180 days from the effective date." HC is proposing the following change: For tenants and participants, verifications for reexaminations may not be more than 180 days from the effective date "OF THE TRANSACTION."</p> <p>This change while minor and non substantive will streamline the verification process and provide more flexibility for households.</p>		
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F.	Public Housing Operating Subsidy Grant Reporting.
F.1	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2021	\$1,627,200	\$1,627,200	\$0	2021-12-31
2022	\$1,162,015	\$1,162,015	\$0	2022-12-31
2023	\$803,781	\$803,781	\$0	2023-12-31
2024	\$653,430	\$272,262	\$381,168	2024-12-31

G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
Income Level		Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income		
49%-30% Area Median Income		
Below 30% Area Median Income		
Total Local, Non-Traditional Households		0

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

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

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

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

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.	

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

H.	Public Comment
Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.	
Please see attached for an additional public hearing held for Agency-Specific Waiver(s) and/or Safe Harbor Waiver(s)	

I.	Evaluations.	DRAFT
Yes - This table lists evaluations of Salt Lake County (Housing Connect)'s MTW activities, including the names of evaluators and available reports		

Table I.1 - Evaluations of MTW Policies

Title and short description	Evaluator name and contact information	Time period	Reports available
Stepped and Tiered Rent Demonstration. Housing Connect's participation in the second cohort of the MTW Expansion will evaluate alternative rent policies designed to increase resident self-sufficiency and reduce PHA administrative burdens. Housing Connect will be studying a Stepped Rent model. An independent research team lead by MDRC will work with HUD, Housing Connect, and the other selected PHAs to assist in implementation and evaluate the effects of the alternative rent policy.	James Riccio, Principal Investigator James.Riccio@mdrc.org	Evaluation will be conducted over a 6 year period: September 1, 2023- August 31, 2029	

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4. Safe Harbor Waiver-Alternative Income Exclusions

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Safe Harbor Waiver-Alternative Income Inclusions/Exclusions Supplement FY 22-23

Housing Connect (HC) is requesting the following Safe Harbor waiver:

1.v & 1.w. Alternative Income Inclusions/Exclusions (PH & HCV)	<p>The standard MTW waiver permits an agency to establish alternative policies to include or exclude certain forms of participant income during the income review and rent calculation process.</p> <p>HC intends to exclude asset income up to \$50,000 when calculating tenant rent.</p> <p>HC is proposing that elderly and disabled households are <u>not exempt</u> and therefore able to benefit from this MTW flexibility.</p>
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Description of Standard MTW Waiver: The agency may establish alternative policies to include or exclude certain forms of participant income during the income review and rent calculation process.

Statutes and Regulations Waived: For PH, certain provisions of sections 3(a)(1) and 3(b)(4)-(5) of the 1937 ACT and 24 C.F.R. 5.609, 5.611, 960.255, 960.255, and 960.257. For HCV, certain provisions of sections 3(a)(1), 3(b)(4)-(5), and 8(o)(2)(A)-(C) of the 1937 Act and 24 CFR 5.609, 5.611, and 982.516.

Safe Harbors:

- I. Agency must exempt elderly and disabled individuals from this rent determination policy.

Requested Safe Harbor Waiver and Explanation

HC is requesting this Safe Harbor waiver to be able to apply the exclusion of asset income up to \$50,000 for elderly and disabled households. This waiver will reduce program administration and reduce administrative burden while providing increased flexibility and benefit to elderly and disabled households.

HC has included the required impact analysis for this Safe Harbor Waiver.

Comments from Public Hearing

No comments received from Public Hearing. A comprehensive summary of all public comments is provided with Section H.

Commented [MT1]: Need to update after the Public Hearing



Safe Harbor Waiver-Alternative Income Inclusions/Exclusions Impact Analysis Supplement FY 22-23

Under the Moving to Work (MTW) Operations Notice, MTW agencies are required to prepare an impact analysis when submitting Safe Harbor waiver requests for certain activities proposed in the annual MTW Supplement. MTW agencies must prepare the impact analysis:

- Prior to implementation of the MTW activity, if required as a safe harbor;
- For certain activities as defined in the MTW Operations Notice on an annual basis during the implementation of the MTW activity;
- Prior to any Safe Harbor Waiver or Agency-Specific Waiver requests; and,
- At the time the MTW activity is closed out, if an impact analysis was previously required.

HC has prepared this impact analysis to describe the projected impact of the requested Safe Harbor waiver request related to implementing alternative income inclusions/exclusions for Public Housing and Housing Choice Voucher (HCV) families.

A. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution).

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The activity is projected to have minimal impact on the agency's finances.

Currently, approximately 5% of all HC households report income from assets under \$50,000 and of those households, the average annual asset income is \$99. Therefore, this activity is projected to result in an average decrease in tenant share of approximately \$3 per month, and an increase in agency HAP costs of approximately \$5,760 annually.

Further, upon implementation of HOTMA certain types of assets (i.e. retirement accounts) will no longer be considered in the calculation of net family assets; therefore, additional households may experience a decrease in tenant rent share resulting from application of HOTMA policies and not necessarily attributable to this MTW activity.

B. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs).

HC does not project any impact on the affordability of housing costs for families.

C. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist).

HC does not expect that the proposed activity will have any impact on the agency's waitlist including on the amount of time families are on the waitlist.

D. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency).

HC does not expect that implementation of this activity will have any measurable impact on HC's

termination rates for either the public housing or HCV programs. HC's current grievance/informal review/hearing policies provide participating families with the opportunity to dispute HC's calculation of income and rent.

E. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program.

HC does not expect that implementation of this activity will have any measurable impact on current public housing occupancy rates or HCV utilization rates.

F. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice.

HC projects that this activity will have a positive effect on resident and participant self-sufficiency as it will incentivize and allow families to earn additional income without impacting their rent share.

G. Impact on the agency's ability to meet the MTW statutory requirements.

Implementation of this activity is not projected to have a measurable impact on HC's ability to meet the MTW statutory requirements. HC intends to fully comply with the MTW statutory requirements throughout its participation in the MTW Program.

H. Impact on the rate of hardship requests and the number granted and denied as a result of this activity.

HC does not anticipate that implementation of the requested Safe Harbor waiver request will generate additional hardship requests.

I. Across the other factors above, the impact on protected classes (and any associated disparate impact).

HC does not project any negative impacts including disparate impacts on protected classes as a result of implementing the requested safe harbor waiver.

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5. Other Documents

- a) Public Comment & Action
- b) RAB Comments/Minutes/Approval
- c) Board Resolution
- d) Certification by State or Local Official 50077-SL
- e) Certifications of Compliance 50075 MTW
- f) Certifications of Compliance 50077 -ST-HCV-HP
- g) Certification of Compliance 50077 CR

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