

# PHA Name : Housing Authority Of Bergen County

**PHA Code :** NJ067

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

**PHA Program Type:** Housing Choice Voucher (HCV) only

**MTW Cohort Number:** Landlord Incentives

**MTW Supplement Submission Type:** Annual Submission

## **B. MTW Supplement Narrative.**

Annually, the Housing Authority of Bergen County (HABC) creates and adopts a Public Housing Authority Annual Plan (PHA Annual Plan) that describes new and ongoing activities that HABC will implement with the federal resources we are awarded. HUD approval is required for the Annual Plan. This supplemental document to our previously approved PHA Annual Plan outlines: the program design and local innovations intended to improve housing and self-sufficiency strategies for low-income families; the activities HABC will implement to improve and incentivize landlord participation; and how these activities and initiatives will be evaluated.

This Supplement outlines the MTW waivers the HABC will implement and the proposed benefits to the Authority or participants for the period from April 1, 2024 through March 31, 2025.

The Housing Authority of Bergen County (HABC) is an HCV only agency and plans on utilizing MTW waivers to reduce program operation costs, achieve greater cost effectiveness in federal expenditures and increase housing choice for low-income program participants in our Housing Choice Voucher (HCV) program.

- To improve cost effectiveness HABC will perform rent reasonableness determination on PBV units that it owns, manages and/or controls.
- To reduce program operation costs, achieve greater cost effectiveness and incentivize families to become economically self-sufficient HABC will delay household annual recertifications.
- To achieve greater cost effectiveness in federal expenditures HABC will reduce or eliminate asset income reporting requirements allowing families to retain more of their income to help lift households out of poverty or transition off housing assistance.
- To improve program cost efficiencies, achieve greater cost effectiveness, and expand and increase housing choice for program participants HABC will implement vacancy loss payments, damage claims, front-end vacancy loss payments and landlord incentives to promote greater participation of current landlords and increase participation of new landlords.
- To increase program cost efficiencies and expand affordable housing units and choice for low-income households the HABC will expand program opportunities and flexibilities with project based vouchers, increasing the program and project caps and increasing contract length.
- To reduce program costs, HABC will eliminate utility reimbursements

**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).**

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

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

**C. MTW Activities Plan that Housing Authority Of Bergen County Plans to Implement in the Submission Year or Is Currently Implementing**

<b>1.n. - Utility Reimbursements (HCV)</b>
<p><b>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</b></p> <p>To reduce program costs, HABC will be eliminating utility reimbursements. As HABC's per unit cost (PUC) continues to increase due to increased success rate consequent of other MTW activities, HABC is looking to reduce program expenditures in other areas that does not affect housing choice mobility.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Decreased expenditures</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>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.</b></p> <p>MTW activity has yet to be implemented</p>

<b>2.a. - Payment Standards- Small Area Fair Market Rents (HCV)</b>
<p><b>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</b></p> <p>The HABC is a HUD mandated Small Area Fair Market Rent Authority having adopted and implemented policy establishing payment standards by zip code since 2018. Under our MTW status HABC adopted policy and implemented payment standards between 80% and 150% of the SAFMR. Implementation of this policy targeted assistance to households improving leasing success in a very tight housing market, with low vacancy rates, and significant contract rent inflation post COVID. This allows the agency greater flexibility in localizing payment standards by zip code.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Increased expenditures</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>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.</b></p> <p>The HABC has seen a remarkable increase in our HCV lease-up success rate utilizing payments standards up to a 120%</p>

across the program. Coupled with astronomical contract rent increases post-COVID HABC has seen a significant and sharp increase in our per unit cost (PUC). Therefore, HABC will closely examine PS % ranges locally by zip code for most effective program management.

**Does this MTW activity require a hardship policy?**

Provided Already

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

No

**Does the MTW activity require an impact analysis?**

Provided Already

**Please explain the payment standards by ZIP code or "grouped" ZIP codes:**

HABC is mandated Small Area Fair Market Rent Authority. SAFMRs are established and implemented by zip code. Bergen County has 70 zip codes each with their own payment standards that can be found at

[www.habcnj.org/paymentstandards](http://www.habcnj.org/paymentstandards)

**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**

Activity 2022-01 - Rent Reasonableness

**Activity Description**

The HABC is authorized to perform rent reasonable determinations on PBV units that it owns, manages, and/or controls.

**Metrics/Data Collection**

The HABC intends to utilize internal reporting systems to collect and analyze data on the number of households impacted and other relevant information.

Units of Measure – days in housing search, HAP per unit cost (PUC), gross program expenditures, UML utilization rate

Baseline – Monthly PUC, Monthly Utilization Rate, Monthly Street Report, Quarterly Zip Code leasing data, Program Expenditure Success Rate, HUD-50058 Submission Data

Benchmark – increase in cost per household, increase in program cost, improved program expenditure success rate, decreased program reserves, increased leasing success, decreased housing search, increased leasing in areas of opportunity.

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

Cost effectiveness

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

Neutral (no cost implications)

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

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

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

New admissions and currently assisted households

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

The MTW activity applies to all family types

**Does the MTW activity apply to all 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.**

Only project based units owned, managed or controlled by the agency participate in this activity.

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

A more streamlined process in PBV rent reasonableness reports.

**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.**

The HABC ensures impartiality performing rent reasonableness for units owned, managed or controlled by the Authority by utilizing an objective third party software to determine and select comparable units. Internal agency quality control reviews the file to ensure that contracts rents do not exceed reasonable rent charged for unassisted units.

See below attachment with excerpt from HABC HCV Administrative Plan on Rent Reasonableness.

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

This document is attached.

### **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**

Activity 2022-02 – HCV Reexamination

#### **Activity Description**

This activity allows HABC to waive the requirement to conduct a reexamination of family income and composition at least annually. HABC will delay reexaminations for participating households.

- In an effort to maximize administrative efforts and cost effectiveness HABC will permit fixed income senior (62+ years old) or disabled households to recertify their income every three years and all other households to recertify their income every two years. HABC will permit all wage-earning households one interim adjustment annually, at the request of the household, for loss of income 10% or greater of the gross annual income calculated at the last annual recertification. Implementation of the waiver is expected to achieve greater cost effectiveness, increase household earned income and reduce administrative costs. HABC proposes to simplify the recertification process coupled with a reduction in the frequency of annual re-examinations determining a household's income and portion of rent to incentivize participating households to gain employment. Further, eliminating the need for interim income changes allows families to keep more of their income and ensure rent stability; exceptions to the interim examination procedure are Zero Income households, households with Earned Income Disallowance (EID) , AND adult household members reporting lapse of wages (i.e. temporary leave, unemployment, loss of job, etc.). Interim reporting of newly hired or increased wages through continuous employment (i.e. promotion, higher paying job, etc.) of adult household members will not be required until the next re-examination.

Metrics/Data Collection

The HABC intends to utilize internal reporting systems to collect and analyze data on the number of households impacted and other relevant information.

Units of Measure – staff hours to complete the task, total program costs, cost per household

Baseline – total tenant payment, household earned income,

Benchmark - reduced administrative burden measured by staff time to complete a task, reduced case load per staff member, increased program efficiencies, decreased program errors, increased program cost efficiencies (less overtime).

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

Through this MTW activity HABC was able to halve employee annual caseloads, and better address timely 50058 PIC transmissions. However, HABC has noticed increased interim activity for landlord rent increases. Additionally, HABC noticed some households were taking advantage of the interim wages policy, which in turn caused sharp increases in HAP expenditures. Therefore, HABC has strengthened our interim policy concerning wages of adult household members. Program roll out of triennial certifications continues to be delayed due to software limitations.

**Does this MTW activity require a hardship policy?**

Provided Already

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

No

**Does the MTW activity require an impact analysis?**

Provided Already

**What is the recertification schedule?**

Other

Once every three years for fixed income senior and disabled households, once every two years for all other households.

**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.**

Household changes due to reduction or increase in household members will be processed regularly, not as the limited interim change. Program rollout of triennial certifications continues to be delayed due to software limitations.



### 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**

Activity Description

This activity allows HABC to waive the requirement to verify all household members assets at least annually.

- The HABC will allow recertifying households to self-certify assets up to \$5,000 annually. Verification of assets, regardless of value, will be completed for all new admissions to established baseline information. These program improvements are expected to improve household income and provide incentive to families to seek gainful employment and increase the share of households moving toward self-sufficiency.

Metrics/Data Collection

The HABC intends to utilize internal reporting systems to collect and analyze data on the number of households impacted and other relevant information.

Units of Measure – staff hours to complete the task, total program costs, cost per household

Baseline – total tenant payment, household earned income,

Benchmark - reduced administrative burden measured by staff time to complete a task, reduced case load per staff

member, increased program efficiencies, decreased program errors, increased program cost efficiencies (less overtime).

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

Activity has streamlined and decreased processing times of participant asset documents in biennial recertifications.

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

No

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

\$5,000.

### 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**

Activity 2022-03 – Cohort Specific Landlord Incentives: Loss and Incentive Payments

Activity Description

The HABC proposes to undertake activities to increase landlord participation in the HCV program through financial and programmatic waiver incentives.

- Implementation of vacancy loss, damage claims, landlord incentives and front-end vacancy loss payments are anticipated to further HABC's efforts to expand and increase housing choices for low-income families. The HABC plans to provide these waiver activities under one HCV leasing initiative to encourage owner participation in the HCV program, attract new landlords, increase inventory of participating landlords and increase inventory of larger size rental units.

Vacancy Loss:

The HABC may pay a landlord up to one-month contract rent (NOT TO EXCEED \$2,500) as reimbursement for time the unit has spent vacant between HCV participants. This applies only when an HCV participant leaves a unit, and the next tenant is also an HCV participant. If the unit is vacant for less than one month, the PHA may pay up to the prorated share of the contract rent, based on the number of days the unit was vacant.

Front-End Vacancy:

To incentivize a landlord's initial or continued participation in the HCV program, the agency is authorized to make additional payments to the landlord in circumstances where the previous tenant was not an HCV participant. Payments made to the landlord must be equal or lesser than one month of the contract rent (NOT TO EXCEED \$2,500).

Metrics/Data Collection

The HABC intends to utilize internal financial reporting systems to collect and analyze data on the number of assisted units and landlords participating in the program.

Units of Measure – number of participating landlords, participating landlord inventory, staff hours to lease up or relocate participants, housing search time

Baseline – current number of participating landlords, current number of units

Benchmark – increase staff time for outreach, increase staff time for landlord support, increased leasing success,

decreased housing search time, reduction in terminations due to eviction, decrease in voucher extension

**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.**

There have been a handful of landlords that benefited from these vacancy payments. HABC was able to keep the units from being turned over from a HCV tenant to a private market tenant.

**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?**

One month's contract rent or \$2,500, whichever is less.

**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

**4.b. - Damage Claims (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**

Activity 2022-03 – Cohort Specific Landlord Incentives: Loss and Incentive Payments

Activity Description

The HABC proposes to undertake activities to increase landlord participation in the HCV program through financial and programmatic waiver incentives.

- Implementation of vacancy loss, damage claims, landlord incentives and front-end vacancy loss payments are anticipated to further HABC's efforts to expand and increase housing choices for low-income families. The HABC plans to provide these waiver activities under one HCV leasing initiative to encourage owner participation in the HCV program, attract new landlords, increase inventory of participating landlords and increase inventory of larger size rental units.

Damage Claims

The HABC may pay a landlord reimbursement for tenant-caused damages after accounting for any security deposit. The amount of compensation may not exceed the lesser of the cost of damages or two months contract rent (NOT TO EXCEED \$5,000). Damages must be documented, submitted, reviewed, and approved by the HABC. Proof of payment must be provided, and cash payments will not be accepted. Importantly, contingent on landlord executing a new HAP contract with a HABC tenant in order to be eligible for the damage claim.

Metrics/Data Collection

The HABC intends to utilize internal financial reporting systems to collect and analyze data on the number of assisted units and landlords participating in the program.

Units of Measure – number of participating landlords, participating landlord inventory, staff hours to lease up or relocate participants, housing search time

Baseline – current number of participating landlords, current number of units

Benchmark – increase staff time for outreach, increase staff time for landlord support, increased leasing success, decreased housing search time, reduction in terminations due to eviction, decrease in voucher extension

**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.**

HABC has faced some challenges in verifying and streamlining damage claims, but remains committed in providing this incentive to our participating landlords.

**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 lesser of the cost of repairs or two month's contract rent after security deposit is first applied to cover damages.  
(NOT TO EXCEED \$5,000)

**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

**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**

Activity 2022-03 – Cohort Specific Landlord Incentives: Loss and Incentive Payments

**Activity Description**

The HABC proposes to undertake activities to increase landlord participation in the HCV program through financial and programmatic waiver incentives.

- Implementation of vacancy loss, damage claims, landlord incentives and front-end vacancy loss payments are anticipated to further HABC's efforts to expand and increase housing choices for low-income families. The HABC plans to provide these waiver activities under one HCV leasing initiative to encourage owner participation in the HCV program, attract new landlords, increase inventory of participating landlords and increase inventory of larger size rental units.

**Landlord Incentive Signing Bonus :**

The PHA may provide incentive payments up to one month of contract rent (NOT TO EXCEED \$2,500) to incentivize new landlords or existing landlords to bring new or former units online to join the HCV program. If a former unit was not subsidized by the HABC for more than three (3) years since last HAP payment, unit will qualify for a signing bonus.

**Metrics/Data Collection**

The HABC intends to utilize internal financial reporting systems to collect and analyze data on the number of assisted units and landlords participating in the program.

Units of Measure – number of participating landlords, participating landlord inventory, staff hours to lease up or relocate participants, housing search time

Baseline – current number of participating landlords, current number of units

Benchmark – increase staff time for outreach, increase staff time for landlord support, increased leasing success,

decreased housing search time, reduction in terminations due to eviction, decrease in voucher extension

**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.**

HABC has been able to secure many new landlords, and participating landlords bringing new units into to the program.

**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 lesser of one month's contract rent or \$2,500

**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

#### **9.a. - Increase PBV Program 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**

Activity 2022-04 – Project Based Voucher Program Flexibilities

##### Activity Description

The HABC intends to enhance program project based policies to provide additional housing choices for low income households in high opportunity areas, incentivize developers to preserve or create additional affordable housing units, as well as streamline the administration of PBVs owned by the HABC.

- The HABC has a large portfolio of strongly performing project-based voucher (PBV) awards to a broad spectrum of affordable housing projects throughout the County. A significant proportion of the PBV assisted units have been developed by the Authority's affordable housing development affiliate and partner, the Housing Development Corporation of Bergen County (HDC). HABC may increase the number of authorized units receiving project-based assistance to no more than 50% of either the total authorized units or annual budget authority; raise the PBV cap on a project up to 100% and may increase the term length of a PBV HAP contract up to 50 years including extensions. All of these PBV program enhancements are subject to appropriations and the end of HABC's MTW authorization.

##### Metrics/Data Collection

The HABC intends to utilize internal financial reporting systems to collect and analyze data on the number of assisted units and landlords participating in the program.

Units of Measure – increase in PBV UML, increase in ELI and VLI units

Baseline – current number PBV, current number assisted projects, current number ELI/VLI units

Benchmark – lower PBV vacancy rate, decreased leasing/re-leasing time, increase in ELI and VLI units, longer

affordability periods

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

Cost effectiveness

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

Increased expenditures
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b>
The MTW activity applies only to a subset or subsets of assisted households
<b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b>
New admissions and currently assisted households
<b>Does the MTW activity apply to all family types or only to selected family types?</b>
The MTW activity applies to all family types
<b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b>
The MTW activity applies to all properties with project-based vouchers
<b>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.</b>
HABC awarded 100 PBVs in April 2022 and fully leased them all in the FYE 3/31/2023.
<b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b>
No
<b>What percentage of total authorized HCV units will be authorized for project-basing?</b>
25.00%

<b>9.b. - Increase PBV Project Cap (HCV)</b>
<b>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</b>
Activity 2022-04 – Project Based Voucher Program Flexibilities
Activity Description
The HABC intends to enhance program project based policies to provide additional housing choices for low income households in high opportunity areas, incentivize developers to preserve or create additional affordable housing units, as well as streamline the administration of PBVs owned by the HABC.
<ul style="list-style-type: none"> <li>The HABC has a large portfolio of strongly performing project-based voucher (PBV) awards to a broad spectrum of affordable housing projects throughout the County. A significant proportion of the PBV assisted units have been developed by the Authority's affordable housing development affiliate and partner, the Housing Development Corporation of Bergen County (HDC). HABC may increase the number of authorized units receiving project-based assistance to no more than 50% of either the total authorized units or annual budget authority; raise the PBV cap on a project up to 100% and may increase the term length of a PBV HAP contract up to 50 years including extensions. All of these PBV program enhancements are subject to appropriations and the end of HABC's MTW authorization.</li> </ul>
Metrics/Data Collection
The HABC intends to utilize internal financial reporting systems to collect and analyze data on the number of assisted units and landlords participating in the program.
Units of Measure – increase in PBV UML, increase in ELI and VLI units
Baseline – current number PBV, current number assisted projects, current number ELI/VLI units
Benchmark – lower PBV vacancy rate, decreased leasing/re-leasing time, increase in ELI and VLI units, longer affordability periods

**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 properties with project-based vouchers

**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.**

HABC awarded 100 PBVs in April 2022 and fully leased them all in the FYE 3/31/2023.

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

No

#### **9.f. - Increase PBV HAP Contract Length (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**

Activity 2022-04 – Project Based Voucher Program Flexibilities

##### Activity Description

The HABC intends to enhance program project based policies to provide additional housing choices for low income households in high opportunity areas, incentivize developers to preserve or create additional affordable housing units, as well as streamline the administration of PBVs owned by the HABC.

- The HABC has a large portfolio of strongly performing project-based voucher (PBV) awards to a broad spectrum of affordable housing projects throughout the County. A significant proportion of the PBV assisted units have been developed by the Authority's affordable housing development affiliate and partner, the Housing Development Corporation of Bergen County (HDC). HABC may increase the number of authorized units receiving project-based assistance to no more than 50% of either the total authorized units or annual budget authority; raise the PBV cap on a project up to 100% and may increase the term length of a PBV HAP contract up to 50 years including extensions. All of these PBV program enhancements are subject to appropriations and the end of HABC's MTW authorization.

##### Metrics/Data Collection

The HABC intends to utilize internal financial reporting systems to collect and analyze data on the number of assisted units and landlords participating in the program.

Units of Measure – increase in PBV UML, increase in ELI and VLI units

Baseline – current number PBV, current number assisted projects, current number ELI/VLI units  
Benchmark – lower PBV vacancy rate, decreased leasing/re-leasing time, increase in ELI and VLI units, longer affordability periods

**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 properties with project-based vouchers

**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.**

HABC awarded 100 PBVs in April 2022 and fully leased them all in the FYE 3/31/2023 for a length of 20 years.

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

No



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

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>
<b>E.1</b>	<p><b>Agency-Specific Waiver(s) for HUD Approval:</b></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><b>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</b></p> <p>No Agency-Specific Waivers are being requested.</p>
<b>E.2</b>	<p><b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b></p> <p><b>Does the MTW agency have any approved Agency-Specific Waivers?</b></p> <p>MTW Agency does not have approved Agency-Specific Waivers</p>

<b>F.</b>	<b>Public Housing Operating Subsidy Grant Reporting.</b>
<b>F.1</b>	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.

<b>Federal Fiscal Year (FFY)</b>	<b>Total Operating Subsidy Authorized Amount</b>	<b>How Much PHA Disbursed by the 9/30 Reporting Period</b>	<b>Remaining Not Yet Disbursed</b>	<b>Deadline</b>
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<b>G.</b>	<b>MTW Statutory Requirements.</b>	
<b>G.1</b>	<b>75% Very Low Income – Local, Non-Traditional.</b> 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.	
<b>Income Level</b>		<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
80%-50% Area Median Income		0
49%-30% Area Median Income		0
Below 30% Area Median Income		0
Total Local, Non-Traditional Households		<b>0</b>

\*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.

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>
<p><b>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?</b> No</p> <p><b>Please describe the MTW agency's plans for its future rent reform activity and the implementation timeline.</b> The HABC seeks to measure the success and effects of the identified MTW activities the agency proposes to undertake in order to determine a) if rent reform and self-sufficiency policy is warranted, b) which households are to be targeted and c) how the HABC will implement the policy.</p>	

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

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

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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<b>G.4 Comparable Mix (by Family Size) – Local, Non-Traditional.</b>	
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.	
<b>Family Size:</b>	<b>Occupied Number of Local, Non-Traditional units by Household Size</b>
1 Person	0
2 Person	0
3 Person	0
4 Person	0
5 Person	0
6+ Person	0
Totals	<b>0</b>

<b>H.</b>	<b>Public Comment</b>
	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.
	No additional public hearing was held for an Agency-Specific Waiver and/or Safe Harbor waiver

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

### **MTW Hardship Policy**

Any participant who is adversely affected by any implemented HABC MTW activity may request for hardship exemption. Participant will need to demonstrate how MTW activity is adversely affecting their participation compared to previous non-MTW activity. The request can be made to either the Voucher Programs Director or Executive Director. A decision will be made within 2 weeks from received date of request. HABC will suspend the MTW activity beginning the next month after the request until the agency has determined if the request is warranted.

### **Grievance Procedure**

In the event hardship request is denied participant may make an appeal for an informal hearing within ten (10) business days of denial date.

### **Reasonable Accommodations**

Reasonable Accommodations for persons with disabilities are considered in accordance with the HABC Administrative Plan. [\(Please see HABC Administrative Plan Ch. 2 Section 2: POLICIES RELATED TO PERSONS WITH DISABILITIES\)](#)

### **Recordkeeping**

HABC will keep record of all hardship requests, hardship approvals and denials  
[\(Please see HABC Administrative Plan Ch. 16 Section 6: RECORD KEEPING\)](#)

## Ch. 8 Section 3: RENT REASONABLENESS

### **8.3.A. OVERVIEW**

No HAP contract can be approved until the HABC has determined that the rent for the unit is reasonable. The purpose of the rent reasonableness test is to ensure that a fair rent is paid for each unit rented under the HCV program.

HUD regulations define a reasonable rent as one that does not exceed the rent charged for comparable, unassisted units in the same market area. HUD also requires that owners not charge more for assisted units than for comparable units on the premises. This part explains the method used to determine whether a unit's rent is reasonable.

#### ***HABC-owned Units [24 CFR 982.352(b)]***

In cases where an HCV family is receiving assistance in a HABC-owned unit, the HABC must ensure impartiality, determine rent reasonableness in accordance with program requirements, and assist the family in negotiating the contract rent when the family requests assistance. An HABC-owned unit is defined as a unit that is owned by the HABC that administers the assistance under the consolidated ACC (including a unit owned by an entity substantially controlled by the HABC). The Assisted Housing Specialist must communicate the results of the rent reasonableness determination to the family and document the comparables utilized in the participant file. Supervisory review and approval of HABC owned PBV units is completed prior to finalization and files undergo Quality Control reviews monthly.

### **8.3.B. WHEN RENT REASONABLENESS DETERMINATIONS ARE REQUIRED**

#### **Owner-initiated Rent Determinations**

The HABC must make a rent reasonableness determination at initial occupancy and whenever the owner requests a rent adjustment.

The owner and family first negotiate the rent for a unit. At initial occupancy, the HABC must determine whether the proposed rent is reasonable before a HAP Contract is signed. The owner must not change the rent during the initial lease term. Subsequent requests for rent adjustments must be consistent with the lease between the owner and the family. Rent increases will not be approved unless any failed items identified by the most recent HQS inspection have been corrected.

After the initial occupancy period, the owner may request a rent adjustment annually in conjunction with the annual recertification of the tenant household and accordance with the owner's lease. For rent increase requests after initial lease-up, the HABC may request owners to provide information about the rents charged for other units on the premises, if the premises include more than 4 units. In evaluating the proposed rents in comparison to other units on the premises the HABC will consider unit size and length of tenancy in the other units.

The HABC will determine whether the requested increase is reasonable within 10 business days of receiving the request from the owner. The owner will be notified of the determination in writing.

All rents adjustments will be effective the first of the month following 60 days after the HABC's receipt of the owner's request or on the date specified by the owner, whichever is later.

#### ***HABC- and HUD-Initiated Rent Reasonableness Determinations***

HUD requires the HABC to make a determination of rent reasonableness (even if the owner has not requested a change) if there is a 5 percent decrease in the Fair Market Rent that goes into effect at least 60 days before the contract anniversary date. HUD also may direct the HABC to make a determination at any other time. The HABC may decide that a new determination of rent reasonableness is needed at any time.

In addition to the instances described above, the HABC will make a determination of rent reasonableness at any time after the initial occupancy period if: (1) the HABC determines that the initial rent reasonableness determination was in error or (2) the HABC determines that the information provided by the owner about the unit or other units on the same premises was incorrect.

### **8.3.C. HOW COMPARABILITY IS ESTABLISHED**

#### **Factors to Consider**

HUD requires HABCs to take into consideration the factors listed below when determining rent comparability. The HABC may use these factors to make upward or downward adjustments to the rents of comparison units when the units are not identical to the HCV-assisted unit.

- Location and age
- Unit size including the number of rooms and square footage of rooms
- The type of unit including construction type (e.g., single family, duplex, garden, low-rise, high-rise)
- The quality of the units including the quality of the original construction, maintenance and improvements made
- Amenities, services, and utilities included in the rent

#### ***Units that Must Not be Used as Comparables***

Comparable units must represent unrestricted market rents. Therefore, units that receive some form of federal, state, or local assistance that imposes rent restrictions cannot be considered comparable units. These include units assisted by HUD through any of the following programs: Section 8 project-based assistance, Section 236 and Section 221(d)(3) Below Market Interest Rate (BMIR) projects, HOME or Community Development Block Grant (CDBG) program-assisted units in which the rents are subsidized; units subsidized through federal, state, or local tax credits; units subsidized by the Department of Agriculture rural housing programs, and units that are rent-controlled by local ordinance.

**Note:** Notice PIH 2011-46, issued August 17, 2011, provides further guidance on the issue of what constitutes an assisted unit.

### ***Rents Charged for Other Units on the Premises***

The Request for Tenancy Approval (HUD-52517) requires owners to provide information, on the form itself, about the rent charged for other unassisted comparable units on the premises if the premises include more than 4 units.

By accepting the HABC payment each month the owner certifies that the rent is not more than the rent charged for comparable unassisted units on the premises. If asked to do so, the owner must give the HABC information regarding rents charged for other units on the premises.

## **8.3.D. HABC RENT REASONABLENESS METHODOLOGY**

### **How Market Data is Collected**

The HABC will collect and maintain data on market rents in the HABC's jurisdiction. HABC primary resource for rent reasonableness is the software, GoSection8. Information sources include newspapers, realtors, market surveys, inquiries of owners and other available sources. The data will be maintained by bedroom size and market areas. Market areas may be defined by zip codes, census tract, neighborhood, and identifiable natural or man-made boundaries. The data will be updated on an ongoing basis and rent information that is more than 12 months old will be eliminated from the database.

### ***How Rents are Determined***

The rent for a unit proposed for HCV assistance will be compared to the rent charged for comparable units in the same market area. The HABC will develop a range of prices for comparable units by bedroom size within defined market areas. Units proposed for HCV assistance will be compared to the units within this rent range. Because units may be similar, but not exactly like the unit proposed for HCV assistance, the HABC may adjust the range of prices to account for these differences.

The adjustment must reflect the local market. Not all differences in units require adjustments (e.g., the presence or absence of a garbage disposal may not affect the rent in some market areas).

Adjustments may vary by unit type (e.g., a second bathroom may be more valuable in a three-bedroom unit than in a two-bedroom).

The adjustment must reflect the rental value of the difference—not its construction costs (e.g., it might cost \$20,000 to put on a new roof, but the new roof might not make any difference in what a tenant would be willing to pay because rental units are presumed to have functioning roofs).

When a comparable project offers rent concessions (e.g., first month rent-free, or reduced rent) reported monthly rents will be adjusted accordingly. For example, if a comparable project reports rents of \$500/month but new tenants receive the first month's rent free, the actual

rent for the unit would be calculated as follows:  $\$500 \times 11 \text{ months} = 5500 / 12 \text{ months} = \text{actual monthly rent of } \$488.$

The HABC will notify the owner of the rent the HABC can approve based upon its analysis of rents for comparable units. The owner may submit information about other comparable units in the market area. The HABC will confirm the accuracy of the information provided and consider this additional information when making rent determinations. The owner must submit any additional information within 5 business days of the HABC's request for information or the owner's request to submit information.





## **Moving to Work Supplement Plan IMPACT ANALYSIS**

The Housing Authority of Bergen County is a HUD approved Cohort 4 “Landlord Leasing Incentives” Moving to Work (MTW) agency. Cohort 4 seeks to incentivize and attract new Landlords to participate in the Section 8 Housing Choice Voucher (HCV) program. Of the eleven (11) new activities HABC is proposing to implement, two (2) activities require an Impact Analysis.

This written analysis attempts to identify the various impacts of the proposed MTW activity on HABC finances, the affordability of housing costs for affected families, the HABC’s waitlist, program termination rate, the HCV program utilization rate, the HABC’s ability to meet the MTW statutory goals and requirements, as well as identify the anticipated effect on hardship requests and the protected classes.

The activities HABC proposes to implement requiring impact analysis are:

- Payment Standards between 80%-150% of the Small Area Fair Market Rent (SAFMR); and
- Alternative Reexamination Schedules for HCV Households, including Self Certification of Assets.

### **ACTIVITY IMPACT**

#### **2A. PAYMENT STANDARDS – SMALL AREA FAIR MARKET RENTS**

The HABC will set HCV program payment standards between 80%-150% of the Small Area Fair Market Rent (SAFMR). Current Non-MTW program payment standards are set between 90%-110% of the SAFMR, though the HABC has a COVID approved waiver to implement payment standards up to 120% of the SAFMR.

Implementing higher payment standards, will initially increase per unit costs (PUC) and increase agency expenditures while significantly improving leasing success and utilization rate, improve agency ability to consistently house applicants on the wait list and enable wait list opening with regularity. In many cases, participant cost will decrease, at least initially. Implementation of the change in payment standard in conjunction with Landlord Leasing Incentives is expected to increase and improve mobility to areas of opportunity, improve apartment quality standards and reduce relocations. These improvements, in conjunction with the HABCs implementation of Landlord Incentives, are expected to improve leasing success, operating expenditures and maximize cost effectiveness of Federal funding.

#### Data Collection Process and Measurement of Progress/Performance

PUC – Two Year Tool\*

Agency Expenditures – Two Year Tool\*

Leasing Success – Internal Monthly Issuance to Lease Up Report

Utilization Rate – Two Year Tool\*

Wait List – Internal Wait List Success Report

Housing Choice Success – Quarterly Zip Code Report

Disparate Impact – Hardship and Reasonable Accommodation Request

## ACTIVITY IMPACT

### 3B. ALTERNATIVE REEXAMINATION SCHEDULE FOR HCV HOUSEHOLDS

In an effort to maximize administrative efforts and cost effectiveness HABC will permit fixed income senior (62+ years old) or disabled households to recertify their income every three years and all other households to recertify their income every two years. HABC will permit all wage-earning households one interim adjustment annually, at the request of the household, for loss of income 10% or greater of the gross annual income calculated at the last annual recertification. Implementation of the waiver is expected to achieve greater cost effectiveness, increase household earned income and reduce administrative costs. HABC proposes to simplify the recertification process coupled with a reduction in the frequency of annual re-examinations determining a household's income and portion of rent to incentivize participating households to gain employment. Further, eliminating the need for interim income changes allows families to keep more of their income and ensure rent stability; exceptions to the interim examination procedure are Zero Income households, households with Earned Income Disallowance (EID) , AND adult household members reporting lapse of wages (i.e. temporary leave, unemployment, loss of job, etc.). Interim reporting of newly hired or increased wages through continuous employment (i.e. promotion, higher paying job, etc.) of adult household members will not be required until the next re-examination.

#### Data Collection Process and Measurement of Progress/Performance

PUC – Two Year Tool\*

Agency Expenditures – Two Year Tool\*

Utilization Rate – Two Year Tool

Family Self Sufficiency – Zero HAP Terminations, Income/Wages Report

Housing Choice Success – Quarterly Zip Code Report\*

Disparate Impact – Hardship and Reasonable Accommodation Request

*\*Activities can not be separated to determine individual effect on success/performance measure.*