



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
Portland Office; Northwest/Alaska Area
1220 SW Third Avenue, Suite 400
Portland, Oregon 97204-2825

OFFICE OF PUBLIC HOUSING

September 25, 2023

Nicole Utz, Housing Administrator
Housing Authority of the City of Salem
360 Church Street SE
Salem, OR 97301

Dear Ms. Utz:

This letter is to inform you that the Housing Authority of the City of Salem (SHA) Annual PHA Plan and Moving to Work (MTW) Supplement for the Fiscal Year beginning October 1, 2023, is conditionally approved.

The PHA submitted an Agency Specific Waiver and a Safe Harbor Waiver. These waivers are still under review by HUD headquarters and cannot be implemented at this time. The waivers that are being reviewed by HUD are the following:

Self-Certification of Allowable Expenses (Agency-Specific Waiver)

Specifically, SHA requests approval to accept self-certification of allowable expenses, up to an established threshold, as the highest form of verification for families participating in the Section 8 Voucher and Public Housing programs. Expenses exceeding the threshold would require third-party verification.

Alternative Income Inclusions/Exclusions (Alternative Income Inclusions/Exclusions (HCV and PH) (Safe Harbor Waiver)

SHA is seeking to exclude regular non-cash contributions from the calculation of annual household income, as required by 24 CFR 5.609(b)(7), which states, in part, “annual income includes...regular contributions or gifts received from organizations or persons not residing in the dwelling.”

HUD’s conditional approval of this MTW Supplement to the PHA Plan is limited to approval of policies and actions authorized by the 1937 Act and flexibilities waiving provisions of the 1937 Act as outlined by the MTW Operations Notice. In providing assistance to families under programs covered by this MTW Supplement to the PHA Plan, your PHA must comply with the rules, standards, and policies established in the MTW Supplement to the PHA Plan as well as all applicable federal requirements other than those provisions of the 1937 Act waived by the MTW Operations Notice.

Please remember that by signing the “PHA Certifications of Compliance with PHA Plans and Related Regulations”, you are certifying to affirmatively further fair housing. This mandates that your Agency will (1) examine your programs; (2) identify any impediments to fair housing choice within those programs; (3) address those impediments in a reasonable fashion in view of available resources, and (4) maintain records reflecting any actions taken to affirmatively further fair housing. The Office of Fair Housing and Equal Opportunity (FHOO) has completed its civil rights review of the Annual PHA Plan and determined that SHA has met its certification requirements.

Documents relying upon the approved PHA Plan and MTW Supplement (i.e., Administrative Plan, Admission and Continued Occupancy Plan, etc.) should be updated to reflect those policies. Also, the approved PHA Plan and all required attachments and documents should be available for review and inspection at the PHA’s principal office during normal business hours.

If you have questions regarding your Plan or this letter, please contact Billy Young at 971 222-2602, or via email at billy.c.young@hud.gov.

Sincerely,

Daniel Esterling, Director
Office of Public Housing

cc:

John Concannon, MTW Program Director
Jeree Turlington, MTW Desk Officer

PHA Name : Housing Authority Of The City Of Salem

PHA Code : OR011

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 10/1/2023

PHA Program Type: Combined

MTW Cohort Number: Asset Building

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

Salem Housing Authority (SHA) is pleased to submit this Fiscal Year (FY) 2023 Moving to Work Supplement component of the Annual PHA Plan. HUD designated SHA as a Moving to Work (MTW) Agency in September 2022, through the MTW Asset Building Cohort, to test asset building initiatives to encourage growth of savings accounts, increased economic mobility, and/or credit building for assisted households. SHA's MTW Plan and Application selected the HUD-defined "Opt-Out Savings Account" as the initial MTW asset building activity. SHA looks forward to working with HUD and the evaluation team to develop and implement asset building activities and to better understand perspectives and experiences of households participating in the "Opt-Out Savings Account" initiative through the program evaluation process. Additionally, SHA will actively participate in the Community of Practice with HUD, the evaluation team, and other MTW agencies in the Asset Building Cohort to further develop and implement best practices related to this initiative.

This supplement identifies the MTW waivers and activities that SHA will implement in its first MTW Fiscal Year to achieve the three MTW statutory objectives, as well as the goals of the asset building cohort, which are outlined in more detail below.

Statutory Objective 1: Reduce cost and achieve greater cost-effectiveness in federal expenditures.

In our first year as a MTW agency, SHA will leverage MTW authority to implement a range of waivers to achieve administrative efficiencies and cost-effectiveness. These waivers will enable SHA to provide a higher level of customer service and connection with program participants, and to reduce administrative burden for participants and property owners. Program participants will benefit from alternative income inclusions / exclusions, alternative re-exam schedule, and self-certification of assets. Removal of requirements for third party assistance with certain Housing Quality Standards and Project-Based Voucher processes will eliminate administrative time spent coordinating with an Independent Entity to support program participants in more rapidly securing housing.

Streamlining the Rent Reasonableness process to compare units against current market studies will reduce the administrative time spent locating comparable units, maintaining, and updating a database of such comparable units, and will provide property owners with accessible information to determine whether their requested rents will likely meet the Rent Reasonableness test. Additionally, a simplified utility allowance schedule will make it simpler for staff to determine gross rent and tenant rent portions, as well as for program participants to search for housing that meets affordability guidelines.

A great deal of time is spent by both staff and program participants in determination of calculated deductions for medical expenses, disability expenses, and childcare. Eliminating calculated deductions and increasing the standard deductions for dependents and elderly/disabled households will have a net benefit for most households and will reduce time spent for staff, and for participants, in verifying these costs (which do not typically have a truly significant impact on the tenant rent calculation in the end).

Statutory Objective 2: Give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational, or other program that assist in obtaining employment and becoming self-sufficient.

A biennial recertification schedule, without the requirement for families to report increases in income between re-examinations, will provide families with more time between increases in rent, allowing them the opportunity to save money, pay off bills, and increase their economic mobility. SHA will provide families with information about this change in policy that will include information about community resources for asset-building, budgeting, and credit building that are available.

Statutory Objective 3: To increase housing choice for low-income families.

The strategy to promote housing choice and increase the supply of affordable housing will be achieved by increasing the Project-Based Voucher (PBV) program cap and PBV project cap. Expansion of the PBV program will provide new housing opportunities and will support the development of new units within our community.

Additionally, in a market where some property owners "price out" Voucher holders by raising rents in an effort to be above the 40% affordability threshold, increasing the threshold to 50% of adjusted monthly income will allow program participants additional choices when searching for and securing housing.

Economic Mobility (Asset Building Cohort Goal)

Implementation of the Opt-Out Savings Account initiative will be the focal point of SHA's initial economic mobility efforts. SHA plans to use the Opt-Out Savings Account program as a baseline for possible future economic mobility programs. This project will allow SHA to build and expand upon a network of partnerships with service providers, financial institutions, and other community-based organizations to promote economic mobility within our community.

Other activities to promote economic mobility include administrative changes to our rental assistance programs, such as alternative income inclusions/exclusions and an alternative re-examination schedule. We anticipate that these initiatives will

encourage assisted households to seek employment opportunities, increased wages, and build assets.

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	
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)	Plan to Implement in the Submission Year
j. Alternative Utility Allowance (HCV)	Plan to Implement in the Submission Year
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)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Plan to Implement in the Submission Year
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)	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	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness – Process (HCV)	Plan to Implement in the Submission Year
d. Rent Reasonableness – Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Plan to Implement in the Submission Year
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
c. Self-Certification of Assets (PH)	Plan to Implement in the Submission Year
d. Self-Certification of Assets (HCV)	Plan to Implement in the Submission Year
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Not Currently Implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Not Currently Implemented
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
6. Short-Term Assistance	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	

Increase Elderly Age (PH & HCV)	Not Currently Implemented
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Not Currently Implemented
b. Increase PBV Project Cap (HCV)	Not Currently Implemented
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Plan to Implement in the Submission Year
10. Family Self-Sufficiency Program with MTW Flexibility	
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
11. MTW Self-Sufficiency Program	
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
12. Work Requirement	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
14. Moving on Policy	
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
15. Acquisition without Prior HUD Approval (PH)	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
16. Deconcentration of Poverty in Public Housing Policy (PH)	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
17. Local, Non-Traditional Activities	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented

C. MTW Activities Plan that Housing Authority Of The City Of Salem Plans to Implement in the Submission Year or Is Currently Implementing

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

SHA is requesting a waiver to create an alternative utility allowance schedule for Public Housing and Voucher units. The current utility schedule is extensive and difficult for program participants to use. Simplifying the utility allowance will help program participants understand the full costs of potential units, will create administrative efficiencies, and will reduce the likelihood of calculation errors.

SHA will create a utility allowance schedule that considers location, bedroom size, housing type (multifamily/shared wall or single family detached). The simplified schedule will be based on an average expense of the most common fuel types for heating, cooking, and water heating (electric and natural gas) from the utility suppliers within SHA's jurisdiction.

Upon implementation and moving forward, updates to the household's utility allowance will be applied at the next review or update, whether interim (including changes in contract rent for HCV households) or annual re-examination of eligibility.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. The utility schedule must be based upon number of bedrooms, property location, and/or the types of utilities paid by the participant.
- ii. The agency must review its schedule of utility allowances each year and revise its allowance for a utility category if there has been a change of 10 percent or more of the cost from the prior year. The agency must maintain information supporting its annual review of utility allowances and any revisions made in its utility allowance schedule.
- iii. The agency must not include items in the utility schedule that are excluded under HUD regulations.

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.

N/A - this will be the first year of implementation.

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 current utility allowance schedule is complicated and difficult for program participants to understand. Each utility type is represented, along with multiple utility providers (for example, we have two electric utility providers within our jurisdiction). Often the final allowances between all of these providers are within a few dollars of one another.

Instead of providing a separate allowance for each fuel type, we will average the most common fuel scenarios (for

example, all electric, electric with gas heat, electric with gas heat and cooking, electric with gas heat, water heating and cooking) to create simplified figures for each bedroom size within multifamily (duplex, triplex, apartments) and single family units. Amounts for water, sewer, and garbage will also be determined. A flat figure, based upon 50% of the average of water and sewer, will be established for multifamily units with utility chargebacks. All of these figures will be rounded to the nearest \$5 to make them easier to add without the use of a calculator. Seldom-used fuel types (propane, heating oil, and wood) will not be considered in the determination of these averages.

Program participants and residents with higher utility needs may request reasonable accommodation to have additional expenses considered in the determination of their utility allowance.

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

SHA is requesting a waiver to create an alternative utility allowance schedule for Public Housing and Voucher units. The current utility schedule is extensive and difficult for program participants to use. Simplifying the utility allowance will help program participants understand the full costs of potential units, will create administrative efficiencies, and will reduce the likelihood of calculation errors.

SHA will create a utility allowance schedule that considers location, bedroom size, housing type (multifamily/shared wall or single family detached). The simplified schedule will be based on an average expense of the most common fuel types for heating, cooking, and water heating (electric and natural gas) from the utility suppliers within SHA's jurisdiction.

Upon implementation and moving forward, updates to the household's utility allowance will be applied at the next review or update, whether interim (including changes in contract rent for HCV households) or annual re-examination of eligibility.

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- i. The utility schedule must be based upon number of bedrooms, property location, and/or the types of utilities paid by the participant.
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- iii. The agency must not include items in the utility schedule that are excluded under HUD regulations.

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.

N/A - this will be the first year of implementation.

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 current utility allowance schedule is complicated and difficult for program participants to understand. Each utility type is represented, along with multiple utility providers (for example, we have two electric utility providers within our jurisdiction). Often the final allowances between all of these providers are within a few dollars of one another.

Instead of providing a separate allowance for each fuel type, we will average the most common fuel scenarios (for example, all electric, electric with gas heat, electric with gas heat and cooking, electric with gas heat, water heating and cooking) to create simplified figures for each bedroom size within multifamily (duplex, triplex, apartments) and single family units. Amounts for water, sewer, and garbage will also be determined. A flat figure, based upon 50% of the average of water and sewer, will be established for multifamily units with utility chargebacks. All of these figures will be rounded to the nearest \$5 to make them easier to add without the use of a calculator. Seldom-used fuel types (propane, heating oil, and wood) will not be considered in the determination of these averages.

Program participants and residents with higher utility needs may request reasonable accommodation to have additional expenses considered in the determination of their utility allowance.

1.o. - Initial Rent Burden (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

SHA seeks to use MTW flexibility to increase housing choice by changing the Initial Rent Burden from 40% of Adjusted Monthly Income to 50% of Adjusted Monthly Income, allowing participating families greater choice for the communities they seek to reside in. The result will be an increased burden to the family should they choose to utilize this, but the effect on Housing Assistance Payment (HAP) will remain neutral.

Families will be advised at briefing, and at Voucher issuance, of the increased affordability threshold and the risks of choosing a higher rent burden.

This activity operates within the Safe Harbor requirements of the MTW Operations Notice:

- i. Agency must implement an impact analysis.
- ii. Agency must not allow the family share at initial occupancy to exceed 60% of the family's monthly income.

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.

N/A - this is the first year of MTW implementation.

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?

Yes

This document is attached.

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

No

If the MTW agency plans to implement a new maximum income-based rent percentage (higher than 40% of adjusted monthly income), what is that maximum?

50.00%

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

HUD regulations require the inclusion of regular non-cash contributions to the household (excluding food or reimbursement for medical expenses). In some cases, the inclusion of non-cash contributions to the household may result in tenant rent responsibility when the household has no cash resources with which to pay rent, resulting in a situation that puts the household at risk for eviction for non-payment of rent, or having to seek other means of obtaining cash contributions, which could then be considered unreported income. This is especially challenging for tenants of Permanent Supportive Housing (PSH) projects where there are typically no tenant-paid utilities, so any amount of income creates a rent obligation for the family.

Tracking and verifying these contributions is an administrative burden for staff and is often challenging for program participants. Friends and family are hesitant to turn over cellular phone bills and other documentation of their contributions since these documents often contain details that are not directly related to the assisted household. In most cases, the contributions are minimal (typically less than \$100/month). The amount of administrative time spent documenting the contributions offsets the small amount of tenant rent that results by including them in the income calculation.

SHA seeks to exclude from income regular contributions made by someone outside of the assisted household that are not cash paid directly to a member of the household. "Regular" is defined as any contribution occurring three (3) or more times in a 12-month period. To be considered "regular," contributions do not need to come from the same individual or organization.

For example:

- A friend or family member outside of the assisted household pays for cellular phone service for the head of the household by paying the bill directly to the cellular company. Such contribution would be excluded from the income calculation.
- The household receives an average of four (4) deposits from friends and family members outside of the assisted household directly into the checking account of the head of the household. Because these contributions are regular (occurring 3 or more times in a 12-month period) and are cash, they would be annualized and included in the income calculation for the household.

Self-certification of non-cash contributions to the household will be accepted as verification of these amounts, which also provides relief to program participants from cumbersome reporting requirements and brings administrative relief to staff who will no longer have to spend time attempting to verify contributions, which is often administratively burdensome and requires multiple attempts.

Per the MTW Operations notice, safe harbor requirements require the agency to exempt elderly and disabled individuals from this rent determination policy; however, the exclusion of non-cash contributions to the household is beneficial to all participating households. Exempting elderly and disabled individuals would have a negative effect on those households.

SHA seeks a waiver from the requirement to exempt these individuals from this policy.

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 - this is the first year of MTW implementation.

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?

SHA seeks to exclude from income regular contributions made by someone outside of the assisted household that are not cash paid directly to a member of the household. "Regular" is defined as any contribution occurring three (3) or more times in a 12-month period. To be considered "regular," contributions do not need to come from the same individual or organization.

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

HUD regulations require the inclusion of regular non-cash contributions to the household (excluding food or reimbursement for medical expenses). In some cases, the inclusion of non-cash contributions to the household may result in tenant rent responsibility when the household has no cash resources with which to pay rent, resulting in a situation that puts the household at risk for eviction for non-payment of rent, or having to seek other means of obtaining cash contributions, which could then be considered unreported income. This is especially challenging for tenants of Permanent Supportive Housing (PSH) projects where there are typically no tenant-paid utilities, so any amount of income creates a rent obligation for the family.

Tracking and verifying these contributions is an administrative burden for staff and is often challenging for program participants. Friends and family are hesitant to turn over cellular phone bills and other documentation of their contributions since these documents often contain details that are not directly related to the assisted household. In most cases, the contributions are minimal (typically less than \$100/month). The amount of administrative time spent documenting the contributions offsets the small amount of tenant rent that results by including them in the income calculation.

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Per the MTW Operations notice, safe harbor requirements require the agency to exempt elderly and disabled individuals from this rent determination policy; however, the exclusion of non-cash contributions to the household is beneficial to all

participating households. Exempting elderly and disabled individuals would have a negative effect on those households. SHA seeks a waiver from the requirement to exempt these individuals from this policy.

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

Cost effectiveness; Self-sufficiency

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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 - this is the first year of MTW implementation.

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?

SHA seeks to exclude from income regular contributions made by someone outside of the assisted household that are not cash paid directly to a member of the household. "Regular" is defined as any contribution occurring three (3) or more times in a 12-month period. To be considered "regular," contributions do not need to come from the same individual or organization.

MTW CERTIFICATIONS OF COMPLIANCE**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING****Certifications of Compliance with Regulations:
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (10/01/2023), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA.

Salem Housing Authority
MTW PHA NAME

OR011
MTW PHA NUMBER/HA CODE

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Virginia Stapleton
NAME OF AUTHORIZED OFFICIAL

Commission Chair
TITLE

Virginia Stapleton
SIGNATURE

7/13/2023
DATE

*** Must be signed by either the Chairperson or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.**

Statesman Journal | Legal Notices

PUBLIC NOTICE Salem Housing Authority will open a 45-day comment period on May 22, 2023 regarding the Public Housing Agency Annual Plan (PHA), the Capitol Fund Annual Plan, and the Moving to Work (MTW) Supplement. Copies of the proposed plans will be available for review at www.salemhousingOR.com. Residents, local government officials, and other interested parties are invited to comment on the proposed physical and management improvements affecting the Housing Authority's public housing properties as well as updates to the PHA Plan. Written comments on the plans may be mailed to the attention of Jessica Blakely, Salem Housing Authority, 360 Church ST SE, Salem OR 97301 or emailed to jblakely@salemhousingor.com. Written comments received before 4:30 PM on Thursday, July 7, 2023, will be presented to the Commission at their July 10, 2023 meeting. Please contact Jessica Blakely at 503-373-3808 with questions about this notice. Statesman Journal May 23, June 5, 16, 27, July 7, 2023

RESOLUTION NO. 2299

A RESOLUTION ADOPTING THE SALEM HOUSING AUTHORITY’S AMENDED 2023-2027 PUBLIC HOUSING AUTHORITY AND CAPITAL FUND PLANS AND MOVING TO WORK SUPPLEMENT

Whereas, The U.S. Department of Housing and Urban Development (HUD) requires housing authorities to prepare an annual Capital Fund Plan; and,

Whereas, the Salem Housing Authority drafted the required Agency Plans and Moving to Work Supplement in conformance with HUD regulations; and

Whereas, on May 23, June 5, June 16, June 27, and July 10, 2023 a public notice was published in the Statesman Journal newspaper; and

Whereas, on June 30, 2023 a virtual meeting was held with the Resident Advisory Board; and

Whereas, the Housing Authority is required to submit the Agency Plans to HUD for approval.

NOW, THEREFORE, THE HOUSING AUTHORITY OF THE CITY OF SALEM, OREGON, RESOLVES AS FOLLOWS:

Section 1. The 2022-2026 Public Housing Agency Plan is hereby adopted, attached as “Exhibit A”.

Section 2. The 2023-27 Annual Capital Fund Plan is hereby adopted, attached as “Exhibit B”.

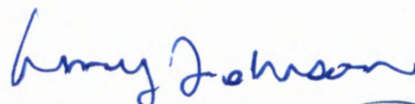
Section 3. The 2023-2024 Moving to Work (MTW) Supplement is hereby adopted, attached as “Exhibit C”.

Section 4. The Housing Authority is authorized to submit the Public Housing agency Plan and the Capital Fund Plan to HUD.

Section 5. This resolution is effective upon adoption.

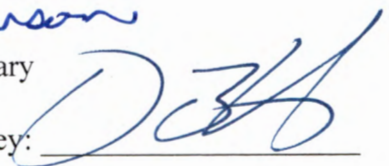
ADOPTED by the Commission of the Housing Authority of the City of Salem this 10th day of July, 2023.

ATTEST:



Deputy Recording Secretary

Approved by City Attorney:



Checked by: N. Utz



CITY OF SALEM

555 Liberty St SE
Salem, OR 97301

Staff Report

File #: 23-270
Version: 1

Date: 7/10/2023
Item #: 4.a.

TO: Chair and Housing Authority Commissioners
THROUGH: Kristin Retherford, Interim Executive Director
FROM: Nicole Utz, Administrator

SUBJECT:

Amendments to the Salem Housing Authority's 2023-2027 Public Housing Agency Plan and Annual Capital Fund Plan

Ward(s): All Wards
Commissioners(s): All Commissioners
Neighborhood(s): All Neighborhoods
Service Area(s): Welcome and Livable Neighborhood

SUMMARY:

The Quality Housing and Work responsibility Act of 1998 requires Public Housing Authorities (PHAs) to submit to HUD Public Housing and Capital Fund Annual Plans.

ISSUE:

Shall the Housing Authority Commission adopt Resolution No. 2299 approving amendments to the Salem Housing Authority's 2023-27 Public Housing Agency Plan and Annual Capital Fund Plan for submission to the U.S. Department of Housing and Urban Development (HUD)?

RECOMMENDATION:

Adopt Resolution No. 2299 (Attachment 1) approving amendments to the Salem Housing Authority's 2022-26 Public Housing Agency Plan (Attachment 2) and Annual Capital Fund Plan (Attachment 3) for submission to the U.S. Department of Housing and Urban Development (HUD).

FACTS AND FINDINGS:

The Capital Fund plan for 2023-2027 shows the intent to use funds to continue modernizing scattered homes. The intent surrounding all Public Housing units is to reposition them into a new funding structure. A new funding line item has been added to the Capital Fund Plan for our new Moving to Work program to assist clients with Asset Building. This is now allowed under program rules.

SHA will also pursue opportunities to keep Glen Creek Apartments in our existing portfolio. Because this property is partially located in a floodway, we will need to determine the feasibility of partitioning the property to obtain approval for using federal funds. The continued operation of the Glen Creek Apartments is important due to its desirable location in West Salem.

The Public Housing Authority Plan and Moving to Work Supplement outline ways SHA would like to take advantage of its new designation. This will bolster our abilities to engage, interact and assist our clients in the Public Housing and Housing Choice Voucher Programs.

BACKGROUND:

These plans are an annual HUD requirement. They have been out for public comment for 45 days.

The Resident Advisory Board met on June 30, 2023. The Board had no comments on the plans.

Nicole Utz
Administrator

Attachments:

1. Resolution 2299
2. Public Housing Agency (PHA) Plan
3. Annual Capital Fund Plan
4. Moving to Work Supplement to PHA Plan

Impact Analyses

1. o. Initial Rent Burden (HCV) – Impact Analysis

SHA finances will remain neutral.

Families who choose to take advantage of the 50% rent burden will pay more towards their housing costs but will be given more choice in choosing their housing options. There is no effect on the waiting list.

Participant families may request an interim adjustment to their rent in the event of a 10% or more loss of gross income, or they may request a hardship request to have a higher payment standard applied to their rent calculation outside of their regularly scheduled reexamination schedule in the event that they do not experience a loss of income.

This activity will not impact the waiting list.

Increased terminations are not anticipated; however, SHA will track terminations relating to non-payment of rent. If it is determined that this MTW activity increases the rate of terminations relating to non-payment of rent, its implementation will be re-evaluated in subsequent years.

It is anticipated that this MTW activity will have a positive impact on housing choice and occupancy, allowing families a wider range of units to select and lease with their Vouchers.

This activity will not impact SHA's ability to meet MTW statutory goals.

Hardship requests are not anticipated.

This activity will not have disparate impact on protected classes.

3.a., b. Alternative Reexamination Schedule for Households (HCV and PH) – Impact Analysis

Savings related to this activity are anticipated (staff time, office supplies, postage), but no impact on agency finances is expected.

There is no anticipated impact on affordability of housing costs for affected families.

There is no anticipated impact on the agency's waiting list.

There is no anticipated impact on the agency's termination rate of families.

There is no anticipated impact on the occupancy and utilization rates.

SHA anticipates an increase in administrative efficiency and cost-effectiveness by implementing this initiative. SHA anticipates approximately 1,000 hours in time savings per year by shifting participating households to a biennial recertification schedule.

There is no anticipated impact on the agency's ability to meet MTW statutory requirements.

Hardship requests are not anticipated.

There is no anticipated disparate impact to protected classes as a result of this activity.

MTW Hardship Policy

SHA offers a hardship policy when households have mitigating circumstances and believe a MTW activity constitutes a financial or other hardship for the family. To qualify for a hardship, the family must be following all program rules and regulations, not owe SHA any money (or be current in a repayment agreement if money is owed). SHA will remind participants of the hardship policy during intake and at regular reexamination, and will consider whether a participant qualifies for a hardship exemption at the time of potential termination of assistance if the termination is related to a MTW activity.

Households must submit requests for the MTW Hardship Policy in writing. Similar to SHA policies relating to interim adjustments, if approved, a reported change must be received by SHA no later than the 20th of the month for the MTW activity to be suspended the first of the following month. Reported changes received by the PHA between the 21st and final day of the month will be effective the first of the second month following the report of the change. For example:

- Change reported October 15th: MTW activity will be suspended November 1st.
- Change reported October 22nd: MTW activity will be suspended December 1st.

Households must identify which MTW activity they are requesting to be suspended:

- Self-Certification of Allowable Expenses (Agency-Specific Waiver)
- Alternative Income Exclusions (1.v., 1.w.)
- Alternative Reexamination Schedule (3.a., 3.b.)

Households must identify the situation that qualifies them for hardship:

- Family has experienced an increase in expenses of more than 25%, such as a large medical expense or significant increase in childcare costs.
- Family has experienced a change in circumstances resulting in a hardship related to the exclusion of up to \$2,000 of annual non-cash contributions to the household.
- Family has experienced an increase in income that may provide them other benefits if implemented (for example, families participating in the FSS program) and wish to request more frequent reexaminations.

If a hardship request is approved, the MTW activity will be suspended and the family's rent calculation will be based on non-MTW regulations. **Please note that calculating rent based on non-MTW regulations may not always result in a rent reduction.** The hardship will be effective until the next annual update or review, up to 12 months.

If a hardship request is not approved, the family will have the right to appeal the decision for further review. If the appeal is denied, the family will have the right to request an informal hearing to review the household income and rent calculation. The informal hearing will be conducted by the SHA Hearings Officer or a member of the management team who was not involved in the decision.

Safe Harbor Waiver Request

1.v., w. Alternative Income Inclusions/Exclusions (HCV and PH) - Safe Harbor Waiver Request

Description of Activity

As part of its MTW initiative, Salem Housing Authority is seeking to exclude regular non-cash contributions from the calculation of annual household income, as required by 24 CFR 5.609(b)(7), which states, in part, “annual income includes...regular contributions or gifts received from organizations or persons not residing in the dwelling.”

Salem Housing Authority requests a waiver from the Safe Harbor requirement to exempt elderly and disabled individuals from this alternative income exclusion.

This effort is made in order to alleviate a rent obligation for households that are receiving support for bills, such as cellular phone coverage, but have little to no other cash income. When participants have a rent obligation from non-cash contributions, it forces them to either face eviction from non-payment of rent or to find cash income sources, which puts them in the position of possibly having unreported income, or a higher rent obligation when the cash is then subsequently included in their income.

This is of particular concern in Permanent Supportive Housing (PSH), where contract rent most often includes all utilities. In traditional housing, a utility allowance is applied in the tenant rent calculation. A low Total Tenant Payment would simply reduce the Utility Reimbursement Payment for which the family is eligible. However, without a utility obligation, the household’s Total Tenant Payment (TTP) essentially becomes their rent obligation, setting them up for immediate eviction and failure to comply with program obligations.

Application of the Safe Harbor for this initiative (exempting elderly and disabled individuals from alternative income exclusions) would have a negative disparate impact on participant households that include individuals who are elderly or disabled. Therefore, we request a waiver of this requirement in order to apply this benefit to all of our participants equally.

Meeting MTW Statutory Objectives

Approval of this safe harbor waiver will meet the following MTW Statutory Objectives:

Statutory Objective 3: To increase housing choice for low-income families.

- Inclusion of non-cash gifts/contributions to the household can create an unsustainable rent obligation, particularly for households with zero or minimal income.
- Creation of a rent obligation for a household with minimal resources puts them at risk of eviction and loss of program subsidy for non-compliance with family obligations.

Population Groups and Household Types Impacted by this Activity

It is anticipated that excluding non-cash contributions from the calculation of annual income will have a positive effect on all participant households; exempting disabled and elderly households from this initiative will have a negative impact on those households as non-cash contributions would continue to be included in their annual income calculation.

Implementation Timeline for the Initiative

Salem Housing Authority will implement the exclusion of non-cash contributions to household income beginning with recertifications effective the first of the month following approval of this safe harbor waiver.

Hardship Policy

Please refer to the attachment titled "MTW Hardship Policy" for a complete description of the Hardship Policy.

Public Comments Received

SHA received no directly submitted public comments regarding our MTW Supplement during the public comment period or at the public hearing. We conducted surveys of community partner organizations, PHA staff, program participants (from both the Section 8 Voucher and Public Housing programs), and property owners with Section 8 residents. A full report of the input received is included as an attachment to the MTW supplement.

Overall, 95% of survey respondents indicated they were neutral or supportive of the initiative to exclude non-cash contributions from the income calculation. Specific comments received regarding this initiative were:

PHA Staff

- This makes so much more sense in our economy today. People reach out to family and friends first and then are penalized for their efforts to remain in good standing as a tenant.
- Non-cash is exactly that and should be treated as such.
- I think this will be a benefit to clients who have family paying for cell phone or something like that, so that does not cause them to have a rent portion when they are not seeing any money to pay a rent portion.
- I think it would be great. It doesn't seem fair to me to count donated clothing or food to someone's income.
- I have never understood why we count someone's cell phone bill being paid by another person as income, so this is a great change.
- Great idea, love it, no notes.

Program Participants (Section 8 Voucher and PH)

- Regular contributions made by someone outside of the assisted household that are not cash paid directly to a member of the household and total \$2000 or less annually. " This phrase makes absolutely no sense. Define "contributions that are not cash." You need a better writer, one who understands using semicolons.
- Always wondered about Birthday money.
- I believe it would put rental amounts for the clients more fairly.
- Not sure what mean on that. But, with the INFLATION Prices nowadays here in Oregon Especially, I don't think that Housing should make Tenants pay ANY EXTRA if get help that is NON-CASH for Ex: If someone in family not living here with me, says, come over

and eat, since I CANNOT EVEN AFFORD FOOD FOR MY SON OR I ANYWAYS. So, do not know how would affect me. MY RENT IS HIGH, and I can barely EAT as is.

- Regular cash contributions should be considered as income. Intermittent/sporadic and therefore unreliable cash contributions should not be included in the calculation. Non-cash contributions below some calculated threshold should not be considered.
- Right now, I think I'd be negative. Sounds like more employees to execute the new policies and let's keep the money where we need it and that would be in rent and food right now food has gone up so much, I'm out of snaps in the first week they cut me down 1/3 of what I used to get. I get \$140 a month for food that's like five grocery bags.
- That would be so great for that for people that have no income or little income.
- You should explain more.

Property Owners

- This program should only be utilized as an emergency for those in the most desperate of circumstances.
- I will not support any self-verifications.
- I feel that you may not get an honest answer.
- Encourages fraud.
- All income should be reported to avoid taking advantage of the program.

Community Partners

- No additional comments were received on the Community Partner surveys, but 100% of respondents were supportive of the initiative.

These comments were reviewed and considered in the development of this Safe Harbor Waiver. The positive and supportive comments aligned with the intention behind this initiative and our request to waive the requirement to exempt elderly and disabled households from the income exclusion – to calculate annual income and rent obligation based upon actual income resources the family receives, and not inflate their rent share based on assistance they may be receiving in the form of bills paid on their behalf or household supplies being provided to them. Negative comments received centered around two primary themes: 1) not understanding the initiative as written, and 2) distrust of program participants to accurately report their income to the Housing Authority (these comments were primarily from property owners).

SHA will ensure that communication to program participants regarding this initiative is clear and concise and will educate staff regarding the initiative so that it can be explained in simple terms to avoid misunderstandings. SHA will continue to investigate reported allegations of program fraud, including misreporting of household income, and will follow standard processes and procedures regarding repayment or other recourse within program parameters when misreporting is verified.

Agency-Specific Waiver – Self-Certification of Allowable Expenses

Description of the Activity

Salem Housing Authority requests an Agency-Specific Waiver to the verification requirements set forth in 24 CFR 982.516 (a)(2)(iii), which states:

- (a) PHA responsibility for reexamination and verification.
 - (2) Except as provided in paragraph (a)(3) of this section, the PHA must obtain and document in the tenant file third-party verification of the following factors, or must document in the tenant file why third-party verification was not available:
 - (iii) Expenses related to deductions from annual income

Specifically, Salem Housing Authority requests approval to accept self-certification of allowable expenses, up to an established threshold, as the highest form of verification for families participating in the Section 8 Voucher and Public Housing programs. Expenses exceeding the threshold would require third party verification.

Verification of allowable expenses is administratively burdensome for staff and cumbersome for participating families. To reduce this burden, SHA is seeking to exercise MTW flexibility to simplify the calculation of deductions for medical expenses, disability expenses, and childcare expenses, the process of verifying those expenses, and how those expenses will impact a household's rent calculation. SHA will permit the submission of expense information and documentation once every 12 months. Interim reviews will not recalculate expenses unless a change in eligibility for those expenses occurs (for example, an adult who was not formerly employed gains employment and the household now has childcare expenses as a result).

Self-certification of medical and disability expenses of no more than \$3,500 annually will be acceptable verification. Receipts / third party documentation will be required for expenses totaling more than \$3,500.

Self-certification of childcare expenses will be accepted for costs not exceeding \$5,000 annually. Third party documentation will be required for childcare expenses in excess of \$5,000.

The requested thresholds for self-certification (\$3,500 annually for medical and disability expenses and \$5,000 annually for childcare expenses) will allow the majority of current participants to self-certify their expenses without the need for third-party verification. Currently:

- 293 of the 1,1817 elderly or disabled households served by SHA claim medical and/or disability expenses, with \$1,208 being the median amount.
 - Only 30 households currently claim expenses in excess of \$3,500.
- 28 households claim unreimbursed childcare expenses. The annual amounts range from \$70 - \$7,860, with the median cost falling at \$2,178.
 - Only four (4) household claim childcare expenses in excess of \$5,000 annually.

SHA will reserve the right to require third party verification of expenses not exceeding the self-certification threshold for administrative and other reasons.

Meeting MTW Statutory Objectives

Approval of this waiver will meet the following MTW Statutory Objectives:

Statutory Objective 1: Reduce cost and achieve greater cost-effectiveness in federal expenditures.

- Accepting self-certification of allowable expenses will reduce the cost of staff time and materials involved in verification of expenses.
 - Reduced postage for outgoing third-party verifications.
 - Reduced staff time creating and mailing third-party verifications.
 - Reduced file storage requirements due to reduction in number of pages required to document expenses.

Statutory Objective 2: Give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational, or other program that assist in obtaining employment and becoming self-sufficient.

- Accepting self-certification for allowable childcare expenses will provide relief from lengthy, and often burdensome, third-party verification requirements.

Population Groups and Household Types Impacted by this Activity

It is anticipated that accepting self-certification as verification of allowable expenses will have a positive effect on elderly households, disabled households, and households with children as this process will alleviate the need for burdensome third-party verification requirements.

Implementation Timeline for the Initiative

Salem Housing Authority will implement the acceptance of self-certification to verify allowable expenses beginning with recertifications effective the first of the month, 120 days from the date of HUD approval of this agency-specific waiver.

Hardship Policy

Please refer to the attachment titled “MTW Hardship Policy” for a complete description of the Hardship Policy.

Public Comments Received

SHA received no directly submitted public comments regarding our MTW Supplement during the public comment period or at the public hearing. We conducted surveys of community partner organizations, PHA staff, program participants (from both the Section 8 Voucher and Public Housing programs), and property owners with Section 8 residents. A full report of the input received is included as an attachment to the MTW supplement.

Overall, 81.25% of survey respondents indicated that they were neutral or supportive of the initiative to permit self-certification of allowable expenses. Specific comments received regarding this initiative were:

Community Partners

- Lessens the burden to access verification of medical expenses when homeless or overwhelmed by the stressors of financial poverty

PHA Staff

- Seems harder to process as the Housing Specialist. We thought it would be a flat amount and no calculations/verifications required.
- Participants may not accurately report expenses. For instance the full cost of medical treatment is not necessarily what they pay .
- I think there are some elderly that don't have the ability to track their expenses and will really benefit from this. I feel the daycare expense is rather high, I don't have many clients that pay anything close to that.
- I think that will be easier for clients/staff to allow self-certification of these expenses. There are not many clients who have medical expenses, but the ones that do - the current process is very cumbersome.
- Much faster and less cumbersome.
- I'm curious how it would work if they are able to self-certify AND 3rd party certify if they think their expenses are over the threshold. At that point if they think they are over the threshold they should just have to 3rd party verify everything? But in general, I think that's a great idea. Verifying expenses on the housing specialist end is a burdensome and time-consuming aspect.

Program Participants (Section 8 Voucher and PH)

- It would make recertification a lot easier.
- Medical cost can be just as high and in most cases higher than child care cost. medical/disability expenses should be the same or higher than child care cost.
- The current system is stressful and burdensome. You wait until the last minute to send the packets then expect ALL of it completed and back in 10 days. That's unrealistic for disabled people.
- Unfortunately Self Certification can lead to fraudulent statements regarding what deductions are needed.
- As someone who provides documentation I already feel that too many falsify and take advantage & only feel that would make falsifying easier.
- Leaves far too much room for dishonesty to cheat the system
- Making the process easier for the applicant will be a good thing
- It can be very frustrating gathering things up. It would mentally make this easier.
- The limits are a bit high for those on fixed incomes
- Updating the policy s to improve our quality of life more
- Don't understand
- I think the deduction for disability should be more considering it is a fixed income.
- The current policy of third party validation is shaming and some providers might feel these patients would be a risk to the financial situation of their practice
- It may ne tpo easy for people to lie/cheat/take advantage of
- If people have to pay for things like that. All of it. Housing Voucher Program is great for people who don't have much money
- Potential abuse probability or potential benefits depending on clients you serve I'm unsure at this stage
- I would surmise that a large % of tenants don't really understand all that goes into this subject. Even some of the workers really don't have the full grasp of what it entails.

- Would save me from having to gather all the info from pharmacy, various doctors, etc. to show proof of out of pocket expenditures.
- Modifications for deductions would not help me and I think it would drain the system of their capital.
- Not sure how that totally works, and I have no Co Pays on my meds. So, this will not apply to me as long as Medicaid still covers I and son's meds.
- I do NOT understand why so many cannot provide necessary documentation for anything. However, many are apparently in that situation and should not be excluded from program participation because of it.

Property Owners with Section 8 Renters

- Opens the door to many people taking advantage of deductions that are not earned or valid.
- I think they should have to verify all deductions
- This is a honesty based modification and that never works, trust but verify
- none
- People are not honest and often take advantage of scenarios like this.
- I place faith in you (section 8) doing screening on qualified to receive housing. Documentation is reasonable expectation.

These comments were reviewed and considered in the development of this agency-specific waiver. The positive and supportive comments aligned with the intention behind this initiative – to reduce reporting burden for program participants and create efficiency in staff time spent obtaining and processing third-party verifications. Many of the negative comments, particularly from property owners, centered around distrust of program participants to accurately self-certify their expenses. It is for this reason that we request a reasonable threshold on the amount that may be self-certified, as well as the right to obtain third party verification if needed (i.e., if it is suspected that the self-certification may grossly overstate the household's expenses).

SHA will ensure that the self-certification form requests that participants provide the names and contact information for the entities they pay for medical, disability, and/or childcare expenses and will include a statement that all adults in the household attest that the information provided is true and complete, and that they understand that SHA may contact these entities to verify expenses.

Cohort-Specific Waiver Request – Opt-Out Savings Program

As part of its participation in the Asset-Building Cohort of the MTW Program Expansion, SHA intends to establish an Opt-Out Savings Program to deposit a set amounts of funds from HCV Housing Assistance Payment (HAP) or Operating Fund each month into an escrow account for the benefit of an assisted household.

Normally, a household must opt-in under a Contract of Participation in a Family Self-Sufficiency (FSS) program to receive funds from the PHA through an escrow account. This MTW waiver and associated activities does not require participation in a traditional FSS program by the PHA or the household, eliminates the FSS Contract of Participation and other requirements, and allows the PHA to contribute funds to assisted households with the goal of increasing savings.

Cohort 5.1. Opt-Out Savings Account

Activity: 5.1.a, Opt-Out Savings Accounts (Public Housing) and 5.1.b. Opt-Out Savings Accounts (Housing Choice Voucher)

The agency is authorized to provide funds to assisted households with the goal of increasing savings of assisted households.

- Funds shall be provided in the form of a savings account that will accrue for at least one year ***or until the account reaches \$120;***
- No contract of participation will be required;
- Households do not need to meet eligibility requirements in the FSS statute;
- All Public Housing and Housing Choice Voucher assisted households must be eligible to participate in the program, regardless of elderly and/or disabled status;
- The amounts of contributions are not tied to income and contributions will be made whether or not there is a corresponding increase in tenant rent or participant contribution.

Statutes and Regulations Waived

SHA requests waivers to regulations relating to the creation of Opt-Out Savings Accounts (PH & HCV) as listed in the MTW Asset-Building Cohort Selection Notice: Certain provisions of sections 23(b)-(f), and (n)(1) of the 1937 Act and 24 CFR 984.101-105, 984.201-204, 984.301-306 and 984.401.

The MTW Activity will meet all Safe Harbor requirements, as stated in Notice PIH 2022-11:

- i. The PHA must continue to follow all requirements of 2 CFR part 200.
- ii. 24 CFR 984.305(a) on accounting and reporting must be retained.
- iii. The PHA must contribute at least \$10 per month for the benefit of each assisted household participating in the savings program.
- iv. The PHA must not contribute more per month for the benefit of each assisted household participating in the savings program than the applicable fair market rent of the unit in which they reside. v. The PHA must provide an opportunity for households to opt-out of this activity.

Description of the SHA Opt-Out Savings Program

SHA intends to develop the Rainy Day Opt-Out Savings program in accordance with HUD guidelines and requirements. A maximum of 100 households will be selected from those participating in the Public Housing and/or Housing Choice Voucher programs in the manner prescribed by HUD.

SHA plans to engage with a banking partner to administer the savings accounts, to which SHA will make monthly deposits (via EFT/ACH or other method, as outlined in the agreement with the banking partner). Accounts will be established in the name of the Head of the Household.

So that Rainy Day participants may access their accounts immediately, the initial deposit to the account will be \$120. Thereafter, SHA shall deposit \$100 per month for the following 23 months, for a total contribution of \$2,420 per household.

Maximum Number of Rainy Day Participant Households	100
Anticipated Total Amount of Savings Contributed per Household <i>(\$120 initial deposit, plus 23 monthly deposits of \$100 per month)</i>	\$2,420
Total Anticipated PHA Investment for the 24-month program period	\$242,000

SHA has sufficient funding earmarked to cover the cost of the Rainy Day Opt-Out Savings Program. SHA may, at its discretion, seek additional sources to fund the monthly deposits.

SHA may also seek additional funding sources and partnerships that may allow it to expand or extend the Rainy Day program beyond this initial scope.

SHA intends to seek partnerships with providers of financial education and other programs related to economic mobility to ensure that all Rainy Day participants have the opportunity to access educational opportunities related to budgeting, savings, and other subjects intended to improve economic mobility.

Special Purpose Vouchers – Request for Permission to Operate in Accordance with MTW Flexibilities

SHA seeks HUD permission to operate the following Special Purpose Voucher types in accordance with MTW flexibilities:

- Veterans Affairs Supportive Housing (VASH)

Other Special Purpose Vouchers may be administered MTW flexibilities unless the MTW provisions are inconsistent with the appropriations act or requirements of the program. In the event of a conflict between the MTW provisions and the appropriations act or NOFA for the program, the appropriation act or NOFA govern. These include, but are not limited to:

- Family Unification Program (FUP) Vouchers
- Foster Youth Independence (FYI) Vouchers
- Non-Elderly Persons with Disabilities (NED) Vouchers
- Mainstream Vouchers
- Enhanced Vouchers and Tenant Protection Vouchers (as replaced by HCV)

Initiative	Participant Neutral	Participant Supportive	Participant Neutral and Support	Staff Neutral	Staff Support	Staff Neutral and Support	Property Owner Neutral	Property Owner Support	Property Owner Neutral and Support	Community Partner Neutral	Community Partner Support	Community Partner Neutral and Support	Total	Average Neutral and Supportive
Alternative Utility Allowance	36	46	82	26	74	100	40	40	80	0	100	100	362	90.50
Initial Rent Burden 50%	16	63	79	14	64	78	38	25	63	0	100	100	320	80.00
Modification of Deductions	30	61	91	13	78	91	29	14	43	0	100	100	325	81.25
Alternative Income Exclusions	30	65	95	17	83	100	21	64	85	0	100	100	380	95.00
Alternative Rent Reasonableness Process	30	57	87	22	70	92	60	27	87	50	50	100	366	91.50
Rent Reasonableness - Eliminate 3rd Party Req.	38	50	88	13	87	100	n/a	n/a	0	n/a	n/a	0	188	94.00
Alternative Re-Exam Schedule	14	81	95	13	87	100	33	20	53	0	50	50	298	74.50
Self-Certification of Assets	36	56	92	30	61	91	40	13	53	0	100	100	336	84.00
HQS - Elimination of 3rd Party Requirement	30	61	91	17	83	100	n/a	n/a	0	n/a	n/a	0	191	95.50
Limiting Portability for PBV to 24 months	35	44	79	39	43	82	46	46	92	50	0	50	303	75.75
		Average:	87.9		Average:	93.4		Average:	55.6		Average:	70	Average:	86.20

Overall Results

The MTW survey shows that, overall, people who responded to the survey are supportive or neutral about the planned MTW activities. The Alternative Re-Examination Schedule (every 2 years) garnered the lowest neutral/positive score at 74.5%, and elimination of the 3rd party requirements for HQS and Rent Reasonableness received the highest neutral/support percentage at 95.5%.

The primary lesson learned through this process is that intentional outreach and education will be necessary as we move forward with our MTW implementation. We want to ensure that our program participants, staff, and our community, understand what we intend to accomplish. This being our first year of implementation, we have done our best to select initiatives that are fairly simple to implement, but as we move forward with MTW, we will identify areas where we can test innovative new strategies, and participation from all of these groups will be vitally important. We want all of our stakeholders to feel engaged in this process.

Program Participants - 82 responses

Comments were largely supportive of the planned activities. Most negative or unsure comments reflected a lack of knowledge about PHA processes and how the changes will affect their participation. Our main learning point from the surveys is that we will need to ensure that we effectively communicate the changes in multiple ways, multiple times, to ensure understanding. We anticipate that results from future surveys about our MTW activities may show increased understanding as it can be easier to understand the changes once they are in place.

Property Owners/Managers - 16 responses

Property owners and managers did not express as much support for the proposed activities. Their responses and comments expressed distrust of program participants to properly self-certify assets and expenses; however, these initiatives generally have no effect on property owners' interactions with the PHA. The response rate to the survey for property owners and managers was also very low (only 16 responses from more than 1200 unduplicated emails that were contacted). We will continue to include property owners and managers in our public input process in future MTW implementation years, with hopes to receive a higher response rate and, therefore, more robust information.

PHA Staff - 23 responses

Almost 50% of PHA staff responded to the MTW Implementation Survey, and had the highest overall percentage of neutral/support responses to the proposed MTW initiatives. Among staff, comments were generally positive. Some comments demonstrated that more education around the proposed activities and their intended impact will be needed. We will be mindful going forward to ensure that staff are well educated about the proposed activities so they can help program participants understand the changes as well.

Community Partners - 2 responses

SHA maintains solid relationships with our community partners and hosts a monthly Emergency Housing Network meeting in partnership with a local shelter provider. We are also very involved in other partner groups. The low response rate to the survey was a surprise. We hope to be able to better engage with partners about Moving to Work and its impact on our program participants in the future to ensure that our initiatives are meeting their intended impacts.

Resident Advisory Board - June 30, 2023

No comments were received from the RAB at its meeting on June 30, 2023.

Public Hearing - July 10, 2023

No comments were received at the Public Hearing held July 10, 2023.

Public Comment Period

No comments were received during the advertised 45-day public comment period.

Salem Housing Authority conducted the following public outreach regarding our draft MTW Supplement to the PHA plan and proposed MTW activities for the 2023-2024 program year:

- 1) Public Notice comment from May 22, 2023 – July 7, 2023.
 - a. Comment period was advertised on the Salem Housing Authority website.
 - b. Comment period was advertised in the local newspaper on multiple dates.
- 2) Online surveys that were mailed to stakeholders on/around May 22, 2023 and were available for completion until 11:59 pm on July 7, 2023. Stakeholders included:
 - a. Community partner organizations.
 - b. PHA staff.
 - c. Program participants (Public Housing and Housing Choice Voucher).
 - d. Property Owners and Managers.
- 3) Resident Advisory Board meeting held June 30, 2023.
- 4) Public Hearing held July 10, 2023.

No comments were received through the general Public Notice comment period.

No comments were received at the Resident Advisory Board meeting.

No comments were received at the Public Hearing.

Comments received from the surveys are included here, separated by stakeholder group (identified at the bottom of each page). Graphical representation of the survey results are also included.

Do you have any additional comments about the Initial Rent Burden change to 50% of Adjusted Monthly Income?	Do you have any additional comments about the Modification of Deductions?	Do you have any additional comments about the Alternative Income Exclusion?	Do you have any additional comments about the proposed alternative Rent Reasonableness Process?	Do you have any additional comments about the Alternative Reexamination Schedule?	Do you have any additional comments about the Self-Certification of Assets up to \$50,000?	Do you have any additional comments about Limiting Portability for PBV units?	<p>Thank you very much for taking the time to complete this survey! We appreciate your input about our planned MTW activities.</p> <p>If you have any additional comments, or ideas for future MTW activities...</p>
						Negative for some and positive for others	
Difficult for persons having to spend up to 50% of adjusted monthly income for rent however, opens up more options and availability	Lessens the burden to access verification of medical expenses when homeless or overwhelmed by the stressors of financial poverty			How might this impact those that are part of the Self Sufficiency Housing Programs?		If someone has to be in a project based unit for 24 months before requesting an HCV this would delay the availability of the project based units.	

Do you have any additional comments about the proposed Alternative Utility Allowance?	Do you have any additional comments about the Initial Rent Burden change to 50% of Adjusted Monthly Income?	Do you have any additional comments about the Modification of Deductions?	Do you have any additional comments about the Alternative Income Exclusion?	Do you have any additional comments about the proposed alternative Rent Reasonableness Process or Elimination of the Third Party Requirement?	Do you have any additional comments about the Alternative Reexamination Schedule?	Do you have any additional comments about the Self-Certification of Assets up to \$50,000?	Do you have any additional comments about Limiting Portability for PBV units?	Thank you very much for taking the time to complete this survey! We appreciate your input about our planned MTW activities. If you have any additional comments, or ideas for future MTW activities...
		Seems harder to process as the HS. We thought it would be a flat amount and no calculations/verifications required.						
								I would like to see when landlords decide to add a utility fee that we can input it with the rent increase instead of doing a OONL or add it at the next annual.
What is the likelihood that this would negatively impact the clients and put more cost burden on them? How can we ensure this won't negatively impact the clients?								
		Participants may not accurately report expenses. For instance the full cost of medical treatment is not necessarily what they pay .						

Do you have any additional comments about the proposed Alternative Utility Allowance?	Do you have any additional comments about the Initial Rent Burden change to 50% of Adjusted Monthly Income?	Do you have any additional comments about the Modification of Deductions?	Do you have any additional comments about the Alternative Income Exclusion?	Do you have any additional comments about the proposed alternative Rent Reasonableness Process or Elimination of the Third Party Requirement?	Do you have any additional comments about the Alternative Reexamination Schedule?	Do you have any additional comments about the Self-Certification of Assets up to \$50,000?	Do you have any additional comments about Limiting Portability for PBV units?	Thank you very much for taking the time to complete this survey! We appreciate your input about our planned MTW activities. If you have any additional comments, or ideas for future MTW activities...
	<p>Allowing a participant to use 50% of their income for housing seems like it could have negative long-term results. The cost of food, gas, electricity will continue to climb and if people on fixed income or low-moderate incomes with minimal savings or access to funds, have any sort of decrease in income, there is great potential for eviction which would ultimately lead to the loss of their voucher.</p>							
					<p>This would be very beneficial and have a Neutral effect for households on fixed income, but not sure how l fee for those families that have sporadic income or income various each year.</p>			

Do you have any additional comments about the proposed Alternative Utility Allowance?	Do you have any additional comments about the Initial Rent Burden change to 50% of Adjusted Monthly Income?	Do you have any additional comments about the Modification of Deductions?	Do you have any additional comments about the Alternative Income Exclusion?	Do you have any additional comments about the proposed alternative Rent Reasonableness Process or Elimination of the Third Party Requirement?	Do you have any additional comments about the Alternative Reexamination Schedule?	Do you have any additional comments about the Self-Certification of Assets up to \$50,000?	Do you have any additional comments about Limiting Portability for PBV units?	Thank you very much for taking the time to complete this survey! We appreciate your input about our planned MTW activities. If you have any additional comments, or ideas for future MTW activities...
	With the price of rents steadily increasing, more and more people whether on assistance or not are approaching rents equal or exceeding 50% of their net monthly income. I feel this change should be made to allow tenants with assistance to compete for better housing. I agree that the education piece should be part of the change.		Non-cash is exactly that and should be treated as such.					
I think it would have a neutral monetary effect on the program but a positive effect on the staff and client calculations and complication.	I think this will allow more choice for a family to lease a unit in more economically advantaged neighborhoods.				I understand that this would alleviate some administrative burden on the PHA but I am concerned it will allow landlords to be lax about maintenance or tenants about cleanliness.	Stop spending dollars to chase pennies.		
I would love there to be a flat fee for one, two, three etc. bedroom units. This would save a lot of staff time.	I feel like a lot of clients would think they could afford the 50% and will end up rent burdened and evicted.			This would possible create a lot more work for the SA doing the RA's.	This would be amazing!		I feel like some clients would be upset about this. Many would like the freedom to move sooner I think.	

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I think having one figure will be so much easier for clients and landlords to understand! It may even eliminate the number of not affordable units that are turned in.	I think that this will cause a lot of tenant requests once they realize how much their rent is after moving in. Unless there is a way to state if you use your max rent at the initial move in, a change will not be implemented for the first year of the lease. (apart from a non-caused income loss event?)	I think there are some elderly that don't have the ability to track their expenses and will really benefit from this. I feel the daycare expense is rather high, I don't have many clients that pay anything close to that.	I have never understood why we count someone's cell phone bill being paid by another person as income so this is a great change.		I think that it should be for fixed income individuals because clients will quickly learn they can work for a year and a half and then quit right before recertification. Unless we implement counting equal to the last 2 years wages as part of that process, I don't think that is using HUD dollars very well.			I do believe that there should be a cap on assistance except for fixed income, elderly or disabled individuals. Let's help our community learn to be self sufficient! This way we help them save, help them earn a degree, whatever their goal would be. I have seen such good results with individuals who have reached their cap on TANF get employment afterwards. This way we continue to help new individuals and the wheel of assistance keeps moving for the community.
I think this would make it much easier for all parties involved to figure out the utility allowance as it is proposed.	My worry on this is that it will become harder for clients to make their rent portions if entering a contract at 50% and then imposing future rent increases take them much higher than 50% for rent/utilities. I would propose to keep it at 40%.	I think that will be easier for clients/staff to allow self certification of these expenses. There are not many clients who have medical expenses, but the ones that do - the current process is very cumbersome.	I think this will be a benefit to clients who have family paying for cell phone or something like that, so that does not cause them to have a rent portion when they are not seeing any money to pay a rent portion.	I do feel like we need to have an easier way to do RR. I know that the survey done twice a year should be accurate, but still find it seems low compared to units I see coming in.	This is positive for all parties involved, especially for clients when their income increases. We would still do decreases in income interims! :)	this is great. It will benefit all parties. Would it have to be verified by third party if they closed an account? Would they just say they have 2 checking accounts and the balance is \$500 between both of them?	I think this assists the agency more than the tenants, but also know that if there were no vouchers available, they would have to wait anyway.	
No	No	No	No	No	No	No	No	

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Not where I would focus my efforts or resources, but every little bit helps.	this increase is minimal and it will cause more people to depend on other assistance. In the long run the cons outweigh the pros. I think we're better off doing a flat rate really.	Much faster and less cumbersome.	This makes so much more sense in our economy today. People reach out to family and friends first and then are penalized for thier efforts to remain in good standing as a tenant.	Less administrative burden, but more of a chance for bias in making determinations.	I am not certain if it would make recerts more cumbersome or if it would be good for tenants whose income is variable. Would it then require full recerts on Self-cert only properties, etc?		one year already seems long. PBV is a great way to train up tenants to be voucher participants.	Reduce administrative burden and environmental burden by going fully digital.
The current utility sheet is extremely confusing for clients-it is seldom they answer correctly. This would take a huge load off clients and staff and decrease errors on both sides. Great idea!	I think it would raise satisfaction of clients. That might be difficult for them in the long run but short term they would probably be happier. But they may also choose to budget more accordingly if it is worth it to them. And long term they may even be happier if that particular housing was worth it to them.	I'm curious how it would work if they are able to self-certify AND 3rd party certify if they think their expenses are over the threshold. At that point if they think they are over they threshold they should just have to 3rd party verify everything? But in general I think that's a great idea. Verifying expenses on the housing specialist end is a burdensome and time consuming aspect.	I think it would be great. It doesn't seem fair to me to count donated clothing or food to someone's income.	The alternative rent reasonableness sounds good, but I don't quite understand the benefits or negatives of the elimination of the third party requirement. I would be interested to know the benefits of that.	Yes, the housing specialist job workload is overwhelming to do every client annually. Biennially is an amazing idea, hopefully housing specialists won't feel like they're dying all the time.	50,000 seems extremely high. Maybe up to 10,000. That would be easier on staff but that number seems exorbitant.	I am interested to know the benefits of this decision. I feel giving 12 months for someone is a reasonable amount of time. 24 months seems like a long time to have to wait to transfer if someone needed to.	Lots of good ideas! Thank goodness change is happening!
sounds like a good idea to me	no	no	great idea, love it, no notes.	no	no	no	how would this help the client? limiting people's ability to move their voucher seems like a negative impact to me.	I like most of these ideas! Cheers!

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		It would make recertification a lot easier.							
	Rent proces continue to increase making many places unavailable at the 40% level.								
		Medical cost can be just as high and in most cases higher then child care cost. medical/disability expenses should be the same or higher then child care cost.							
	I feel this will be good because people on assistance like tanf with very low income the rent amount to stay under is not realistic. I've been looking to move for over a year and my approved rent amount is hundreds of dollars under what 2 bedrooms are actually renting for because I don't have much contribution.								
		The current system is stressful and burdensome. You wait until the last minute to send the packets then expect ALL of it completed and back in 10 days. That's unrealistic for disabled people.							
		Unfortunately Self Certification can lead to fraudulent statements regarding what deductions are needed.							
Use the average for the last 12 months of the unit. This information can be obtained from the utility companies..									

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					It would be a godsend. Recertification is a nightmare for someone with ADHD.				
		As someone who provides documentation I already feel that too many falsify and take advantage & only feel that would make falsifying easier.							
	What happened to 30% ?								
	Large rent increase in the past couple of years. the rent on my apartment went up \$300								
					This would cut down the backlog				
	That would just make it harder on people who struggle now with rent being as high as it is. If they get into something that is half of their income, a few months down the road when winter comes they are going to have to decide between heat and rent.								
She Can't understand any of this as She has Dementia?									
My utilities are all electric, which is more expensive than a combination of electric and gas, so it would affect me adversely.	I can barely pay for my rent and utilities at the 40% level								
Helping people find a good balance of a safe living environment not just an affordable one	Would be able to find safe housing along with an affordable one								
it is going to take more than this to help get people out of poverty	how much would this cost all the tax payers								

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Averaging use by a district (if I understand correctly) would not allow for those that need to use electricity for health reasons, even now health reason for higher electric bills is not included and should be.	None at this time.			None at this time.					
No	Can't live on that high %								Not to take peoples business income to affect the rent.
	The rising cost of living and the rising costs of housing AND changing the AMI could cause the people to suffer financial insecurity and potentially make their situations worse.	Leaves far too much room for dishonesty to cheat the system			Families could bring in a lot more money that puts them over limit and not report it. Recertification every year decreases this risk				
Will separate utility charges from the apartment complex be counted in the equation of the AUA?		N/A for me at this time			Having to renew and inspect every year seems like a waste of resources and money that can go to different programs within SHA				
Averaging anything always comes with outliers who will be negatively affected	Rents are increasingly higher to the point that it's impossible to find housing that fits the current requirements	Making the process easier for the applicant will be a good thing							
not everyone uses the same amount of heat and water	is the 40% what the tenant pays?			hope this well help with the cost of rent tenants are currently paying					I think these are all great ideas.
No	No	No	No						
It's like voting on "no" possible scenarios, already pay \$160.00 a month during winter months for a 570 Sq foot apartment built in the 70's. Charge owners for NOT fixing the 93 yo insulation!		No	No	When I had my move in inspection, He asked me what things were wrong, did a quick walk around, then only listed a couple of thing I mentioned (lived here 5 years) compared to other that inspected it.					

Do you have any additional comments about the proposed Alternative Utility Allowance?	Do you have any additional comments about the Initial Rent Burden change to 50% of Adjusted Monthly Income?	Do you have any additional comments about the Modification of Deductions?	Do you have any additional comments about the Alternative Income Exclusion?	Do you have any additional comments about the proposed alternative Rent Reasonableness Process or Elimination of the Third Party Requirement?	Do you have any additional comments about the Alternative Reexamination Schedule?	Do you have any additional comments about the Self-Certification of Assets up to \$50,000?	Question	Do you have any additional comments about Limiting Portability for PBV units?	Thank you very much for taking the time to complete this survey! We appreciate your input about our planned MTW activities. If you have any additional comments, or ideas for future MTW activities...
Maybe explain what the heck a charge back is, i still can't get anyone to explain it to where i understand it.	It feels like it would open up more possibilities as far as places we would quality for	It can be very frustrating gathering things up. It would mentally make this easier.		I'm still confused by both.					
No. Although any assistance would be positive		The limits are a bit high for those on fixed incomes				No	No additional statement	I'm not sure that it's a positive thing to process PBV prior to the waitlist.	
It's a great idea to improve the program s. To enhance other options	Gives the households more options to look at to rent.	Updating the policy s to improve our quality of life more			I think it will be a great idea every 2 years.				Updating the policy s to current conditions of are economy.To enhance and improve the program s for the community.Thank you
	Don't understand this	Don't understand	You should explain more		We will get recertification every two years instead of every year. That could actually be more work for the case worker				It's very confusing what you plan to do. Caseworker might want to explain in simpler terms. Housing could be improved. Especially now with cost of living so high. I'm Especially grateful and thankful for housing. The help that I get. On my income couldn't afford to live because of the over priced houses and apartments out there. They certainly aren't worth what they are asking. Thank you for all your help. In order to really be able to see if these improvements you'd like to make are to my benefit. Would need more explanation 😊

Do you have any additional comments about the proposed Alternative Utility Allowance?	Do you have any additional comments about the Initial Rent Burden change to 50% of Adjusted Monthly Income?	Do you have any additional comments about the Modification of Deductions?	Do you have any additional comments about the Alternative Income Exclusion?	Do you have any additional comments about the proposed alternative Rent Reasonableness Process or Elimination of the Third Party Requirement?	Do you have any additional comments about the Alternative Reexamination Schedule?	Do you have any additional comments about the Self-Certification of Assets up to \$50,000?	Question	Do you have any additional comments about Limiting Portability for PBV units?	Thank you very much for taking the time to complete this survey! We appreciate your input about our planned MTW activities. If you have any additional comments, or ideas for future MTW activities...
	I think if your on a fixed income it would be harder to make rent plus other bills. as in ssi, ssdi	I think the deduction for disability should be more considering it is a fixed income.				I think that's fair	I think that the third part inspections should still be in effect	I don't think it should be limited because people never know when they need to move in a hurry	I think a lot of things need to be reconsidered, and especially look and consider different circumstances for people on ssi and ssdi, not tanf cause the majority of people on tanf can look for work, but it's different for people on social security.
Disabled seniors need more help				An unbiased third party provider is good	Since I am on Soc.Sec. my income rarely chanes by a few dollars a year. I think the biannual recertification is much more efficient and would cut down SHA's work load tremendously.and		I think after going threw these annual inspection, a person damn well knows the rules and safety regulations by heart. The newcomers should still be iinspected.I have extreme anxiety and am under a Doctor's care, and these Gustapo like inspections set me back for a whole week afterward. I have never failed an inspection. It feels like a jail search in a prison.	I an elderly senior am being pranked at 2 or 3 in the morning by future wannabe gangstgers. I think a person should be able to escape if the situation is called for.	Just looking for a peaceful place to come home to where I won't be threatened walking to my mailbox, rocks won't be thrown at me and a little privacy from kids staring into my bedroom window while I am reading. Must have window open for air. Thank you I hope I have helped in some tiny way. Bless you 🙏
Not clear. If for example the tenant does not have exclusive use of utility service does that negate the allowance for the bundled eligibility?	Due to astronomical costs of rent everywhere how would a person whose income is below the poverty level even subscribe to the program?	The current policy of third party validation is shaming and some providers might feel these patients would be a risk to the financial situation of their practice		Depending on the Landlord's willingness to keep a tenant maybe	Depending on the type of income.	Depending on the type of asset maybe			
No					No	Yes it is good	Things are going well with current rules	No	I think the voluntary savings account where when you pay your rent some of the money goes into a kind of savings fund. I lost 18 thousand I believe because I couldn't get ft employment in time. Due to Covid but I now have a permanent ft job which I got a week or so after my time ran out. I think the account should still be active until I get a job.

Do you have any additional comments about the proposed Alternative Utility Allowance?	Do you have any additional comments about the Initial Rent Burden change to 50% of Adjusted Monthly Income?	Do you have any additional comments about the Modification of Deductions?	Do you have any additional comments about the Alternative Income Exclusion?	Do you have any additional comments about the proposed alternative Rent Reasonableness Process or Elimination of the Third Party Requirement?	Do you have any additional comments about the Alternative Reexamination Schedule?	Do you have any additional comments about the Self-Certification of Assets up to \$50,000?	Question	Do you have any additional comments about Limiting Portability for PBV units?	Thank you very much for taking the time to complete this survey! We appreciate your input about our planned MTW activities. If you have any additional comments, or ideas for future MTW activities...
Needs to be simplified words/explanations for surveys	It would help	It may ne tpo easy for people to lie/cheat/take advantage of		Some have no other option but to stay in an old apartment or home. Can't afford to move. A new standqrd could cause these people to not get enough funds,to pay monthly rent	Yes this would be extremely helpful. Yearly recertifications are stressful, every 2 years would be great.	Unless its a car, that's a lot of money to have in a bank or other eaaily accessible type of asset.	It would strwamline the process		
Didn't know about the Alternative Utility Allowance	Yes if our rent keeps going up and 50% Adjusted. then what are we to live off . people live on low income. We will all end up in the streets	If people have to pay for things like that.All of it.Housing Voucher Program is great for people who don't have much money	That would be so great for that for people that have no income or little income	I feel that would work out for thousands of people	The Alternative Reexamination Schedule would be great	Self Certification of assets is great		That would make it easier for you and the tenants to move it from 12 months to 24 months.	
It would wonderful to assist people in determining eligibility. Current procedure is a lot more complicated and most applicants do not understand the process.	I believe it would open the door to more opportunities for rental units due to landlords raising costs and rent prices.	Potential abuse probability or potential benefits depending on clients you serve I'm unsure at this stage	I believe it would put rental amounts for the clients more fairly.	Anytime you take away a checks and balance system it leads the way to potential abuses in agencies especially if it's an agency that is talking about its own property leaves the door wide open for potential abuse	Al			Overall positive as long as reasonable accommodations are looked at in a positive manner because a lot of domestic abuse people tend to not want to admit those things and as such use those portability without disclosing their abuse it's a helpful tool for those people suffering from that.	Only suggestion I have is when determination for rental amounts are determined that housing takes into consideration whether or not the person is working at a temporary job and if they are how long will that job last so that they can get an accurate rental amount that's reasonable that they can afford without suffering long-term because that job ended.....
If it is administered like the apartment complexes now, it could be a detriment in being affordable on low-income budgets. It also has lead to metered utilities and rashing of use of utilities.	It is like SS giving an increase in SSchecks and HUD claiming it in raised rents.	I would surmise that a large % of tenants don't really understand all that goes into this subject. Even some of the workers really don't have the full grasp of what it entails.		Positive if it is followed through and records are kept in a manner understandable by Joe Public and accessible to the public. And you do away with the results of HB 2992 or the 2021 legislative session.	It would give more room for fraud, but it would lessen a pain-in-the-ass every year to get all the documents together and staff time tracking down the information needed to complete the evaluation.	What is an asset and who determines the value of the asset? Ambiguous question when you toss in words that are not really definded.		Don't know the program well enough to be able to make an opinion.	Staff need to be better trained in ADA regulations. Visual needs. Hearing needs. Accessibility needs. Just because an owner or their representative says something is up to standards for ADA doesn't mean it is. Documents need to be in readable print. Communications need to be understood by hearing impaired.

Do you have any additional comments about the proposed Alternative Utility Allowance?	Do you have any additional comments about the Initial Rent Burden change to 50% of Adjusted Monthly Income?	Do you have any additional comments about the Modification of Deductions?	Do you have any additional comments about the Alternative Income Exclusion?	Do you have any additional comments about the proposed alternative Rent Reasonableness Process or Elimination of the Third Party Requirement?	Do you have any additional comments about the Alternative Reexamination Schedule?	Do you have any additional comments about the Self-Certification of Assets up to \$50,000?	Question	Do you have any additional comments about Limiting Portability for PBV units?	Thank you very much for taking the time to complete this survey! We appreciate your input about our planned MTW activities. If you have any additional comments, or ideas for future MTW activities...
In apartments some only pay electric not water 1#	Start building more affordable housing		Always wondered about Birthday money?	As long as the units are clean I am happy	Less stressful		Will they be the same as normal inspections	In cases of abuse this could prevent help needed	Please consider when on ssi yearly we get a raise cola it is then taken away by lowering food stamps/higher rent So it b is not really a raise at all.
Consider the people that would need the program the most, it would not be in their favor, to effectively lower homeless situations that now are already at higher levels than we want.		None	None	None	None	None	None	None	Ok
average of what? Sizes of units greatly affect these costs. Low income units are typically smaller than those for middle and high income persons. Low income housing typically has poor insulation qualities compared to middle and upper income housing. So, what averages are you using? It matters.	Landlords frequently prohibit Section 8 users from renting by requiring them to have a certain percentage of income compared to the rent amount. They need to compare our income to the RENT WE WOULD ACTUALLY BE PAYING, not the total rent amount. Federal law needs to implement this as a law, which would open up vastly increased housing choices.		"egular contributions made by someone outside of the assisted household that are not cash paid directly to a member of the household and total \$2000 or less annually. " This phrase makes absolutely no sense. Define "contributions that are not cash." You need a better writer, one who understands using semicolons.	Beg legislatures to institute a Universal Basic Income, which would eliminate the need for Housing Authorites and Food banks, thus saving billions of dollars' billions more would be saved due to improved health (so less health care costs) due to less stress, improved ability to set and keep future goals, less crime, less strife between haves and have nots, and more. Nixon proposed this!	for those on SSI or other long-term disability, make it every five years.	Believe us in the first place--no third party documentation at all. Waste of money. People are going to assume that you will check anyway.	? Don't do inspections for units run by landlords and management companies whose maintenance performance have few complaints, or just do a sampling of units manages by each entity or landlord. Inspections are a colossal waste of money. This is not Kolkata.	Again, advocate every chance you get for Universal Basic Income.	Put a flow chart on your website naming all employees and their job titles and responsibilities. Answer the phone and actually return voicemail messages.
No	No	No	No	No	No	No	No	No	
no	Looking at the cost of rentals in our area and how rent keeps going up and then the fact that some areas just are not safe to live in I think this is a good thing for participants even if they have to pay a bit more.	Would save me from having to gather all the info from pharmacy, various doctors, etc. to show proof of out of pocket expenditures.	no	no	Would be less time consuming for housing staff.	no	no	no	

Do you have any additional comments about the proposed Alternative Utility Allowance?	Do you have any additional comments about the Initial Rent Burden change to 50% of Adjusted Monthly Income?	Do you have any additional comments about the Modification of Deductions?	Do you have any additional comments about the Alternative Income Exclusion?	Do you have any additional comments about the proposed alternative Rent Reasonableness Process or Elimination of the Third Party Requirement?	Do you have any additional comments about the Alternative Reexamination Schedule?	Do you have any additional comments about the Self-Certification of Assets up to \$50,000?	Question	Do you have any additional comments about Limiting Portability for PBV units?	Thank you very much for taking the time to complete this survey! We appreciate your input about our planned MTW activities. If you have any additional comments, or ideas for future MTW activities...
I live by myself and everything I have here is electric I have no no gas heater or anything like that so but on the same Block in a one bedroom there might be seven people living there to where their bill would be seven times as much as mine I would rather keep that part the way that it is.	The initial rent Burton wouldn't affect me right now but rent goes up every year So eventually it would help me.	Modifications for deductions would not help me and I think it would drain the system of their capital.	Right now I think I'd be negative. Sounds like more employees to execute the new policies and let's keep the money where we need it and that would be in rent and food right now food has gone up so much I'm out of snaps in the first week they cut me down 1/3 of what I used to get. I get \$140 a month for food that's like five grocery bags.	Sounds like we're spending more money that we don't have! I live in a 50-year-old one bedroom house and I'm happy I am so glad that you guys told me I feel healthier in my mind I'm I'm a lot better than I was you guys save me and I appreciate it.	Sounds like it saved a lot of money that's a good thing.	You can't let things run amok. You have to know what people are doing and why you're spending your money on them.	More efficient.		A little bit more food stamps would help me just to keep up with inflation. thank you
I can't even afford RENT, so, this would not help me in any way.	I am on SSI and Is too high already as is for rent. My Car Payment and Rent, takes all my SSI and son too on SSI, And I think that HOUSING VOUCHERS SHOULD PAY MORE, bottom Line.	Not sure how that totally works, and I have no Co Pays on my meds. So, this will not apply to me as long as medicaid still covers I and sons meds.	Not sure what mean on that. But, with the INFLATION Prices nowadays here in Oregon Especially, I don't think that Housing should make Tenants pay ANY EXTRA if get help that is NON CASH for Ex: If someone in family not living here with me, says, come over and eat, since I CANNOT EVEN AFFORD FOOD FOR MY SON OR I ANYWAYS. So, do not know how would effect me. MY RENT IS HIGH and I can barely EAT as is.	Dont totally understand. But, with the Raising Prices for apartments, bottom line is, that SHA/HUD/Vouchers are not keeping up with the COST of living, meaning, Housing is paying LOWER than what should be, when some are on DISABILITY as I AM and MY SON and when on a fixed income. So, I feel that RENT for Disabled and when on fixed income! Should be LESS! 914 month SSI, does not CUT IT for The Disabled and Fixed income ppl. Sadly, just like SSI IS WAY LOWER than should be, even to keep up with the HIGH cost of living, and soon anyone on SSI or Fixed income, will NO LONGER BE ABLE TO LIVE AT ALL... on it. Or be homeless..	I think the Re Exam period, should be every 6 months, acutually or less... NOT LATER.... SOONER THE BETTER	I think all these NEW Rules that housing is thinking about doing will ALL be NEGATIVE on the NEEDIER...and low and middle class People. Sadly. So, I do not agree with that, and also, do not agree with how is today still. Is wrong. While the Wealthier Families are getting Richer and living well. The others are suffering. Sad.		I think that Wait lists are too long already... and Like old days, if recall, I think that DISABLED people, Such as my son and I, should actually get Apps processed first.. NOT LAST and I think that Going By the WAITING LIST IS GOOD.. Only, it took me 4 years to get my Section 8 Voucher. and even when working directly with the Properties and not waiting on the Hud or Section 8 lists are long.. Too long.	I think that when the cost of living goes up, that SHA HUD etc, should also go up, like ex: if a unit is now 2000 month, then Housing needs to also take that into consideration. And when people are disabled, they are on a fixed income. SSI is also TOO LOW to live on/in an apartment as is.. and Tennants cannot Afford them. SSI NEEDS TO BE ALSO INCREASED and SO DO VOUCHERS... I think that HOUSING IS making TENNANTS pay more than should as is. And housing is not paying their fare share, when someone on FIXED BUDGET and income. We need to pay other bills too, and seems like 90% of income instead of 30% is GOING to RENT... Is WRONG... and I think that actually, that people on SSI and Disability... Should pay ACTUALLY 10-20% if want my true opinion. sad thing about this world now, it's all
No	no	No	no	no	no	no	no	no	

Do you have any additional comments about the proposed Alternative Utility Allowance?	Do you have any additional comments about the Initial Rent Burden change to 50% of Adjusted Monthly Income?	Do you have any additional comments about the Modification of Deductions?	Do you have any additional comments about the Alternative Income Exclusion?	Do you have any additional comments about the proposed alternative Rent Reasonableness Process or Elimination of the Third Party Requirement?	Do you have any additional comments about the Alternative Reexamination Schedule?	Do you have any additional comments about the Self-Certification of Assets up to \$50,000?	Question	Do you have any additional comments about Limiting Portability for PBV units?	Thank you very much for taking the time to complete this survey! We appreciate your input about our planned MTW activities. If you have any additional comments, or ideas for future MTW activities...
No	No	No	No	No	No	No	No	No	
No.	No.	No.	No.	No.	No.	No.	No.	No.	None.
Less complicated is usually better, but is not adequately flexible to deal with real-world variations.	This can allow tenants access to more expensive units but allows them access to units. Many tenants will acknowledge that their housing costs exceed any guidelines. Units are priced without regard to tenants' ability to pay.	I do NOT understand why so many cannot provide necessary documentation for anything. However, many are apparently in that situation and should not be excluded from program participation because of it.	Regular cash contributions should be considered as income. Intermittent/sporadic and therefore unreliable cash contributions should not be included in the calculation. Non-cash contributions below some calculated threshold should not be considered.	The logic for the proposed replacement of current practice appears sound. There remains, however, a need to find ways to encourage market accessibility through incentives to developers and owners. It is also desirable to include a mechanism for identifying units which have been cosmetically altered to appear post-1990.	The proposal appears to offer a way to reduce workload for staff while not appreciably increasing opportunities for fraud.	Raising the threshold above \$5000 should be considered, inflation being a major factor here. Question: Is \$50,000 a typo?	A positive effect is anticipated, provided steps are taken to preclude "sweetheart" arrangements with owners and inspections by SHA are demonstrably impartial. The goal would be to reduce workload AND maintain units AND avoid being on "60 Minutes."	Increasing the tenancy requirement to 24 months may have a positive effect, but close monitoring should be carried out to maintain the integrity of both aspects of the program.	One of your main goals will always be to recruit and retain staff who are committed to successfully bringing qualified tenants into adequate housing and keeping them housed. Developers and owners have their lobbies; we have only you.
Is it for everyone on SHA or dependent upon incomes?	It's hard enough to find a place for 500. What good is 400 are there any places available for 400 sounds like 30 years ago	No	No	It's working the way it is	It's a lot of paperwork and without help filling it out I would think many are becoming homeless I'm college and have difficulty I can't imagine little education and the stress is overwhelming for some I know it is	Too high of an amount	What???????	The wait is always too long and people get lost in the system	Including a few people who actually receive help from SHA. We see many different things then an office or case worker For example the Arches project that has brought so many drug dealers and abusive relationships to our community There never is any follow up and people are vulnerable who have been homeless especially women easily taken advantage of Not enough support and guidance from case workers.

Do you have any additional comments about the proposed Alternative Utility Allowance?	Do you have any additional comments about the Initial Rent Burden change to 50% of Adjusted Monthly Income?	Do you have any additional comments about the Modification of Deductions?	Do you have any additional comments about the Alternative Income Exclusion?	Do you have any additional comments about the proposed alternative Rent Reasonableness Process?	Do you have any additional comments about the Alternative Reexamination Schedule?	Do you have any additional comments about the Self-Certification of Assets up to \$50,000?	Do you currently have Project-Based Vouchers in any of your properties (from SHA or another Housing Authority)?	Do you have any additional comments about Limiting Portability for PBV units?	Thank you very much for taking the time to complete this survey! We appreciate your input about our planned MTW activities. If you have any additional comments, or ideas for future MTW activities...
I pay for my tenant's utilities so not sure about AUA's effect									
							No - there are no PBV units at my properties and I do not plan to add any		Doubtful we will ever participate with these programs as the tenant we tried to help created over 7 thousand dollars of damage to our property which caused a hardship for us as landlords. No reimbursement for damages beyond normal wear and tear is unacceptable
See one on the many "Tent Cities". Do you think these people can afford any utilities.	These people have no insentive. Make them WORK for their section 8.						Yes - there are PBV units at one or more of my properties		
why are hard working tax payers paying for non working people's housing!!!				I will offer properties for rent and tenants can decide if they want it.			No - there are no PBV units at my properties and I do not plan to add any		you need to tighten your restrictions not loosen them. Over 90% of the tenants on welfare do not deserve it and when we finally have one that needs help, there are no funds available or a long waiting time frame. Shame on you!

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		Opens the door to many people taking advantage of deductions that are not earned or valid.			One year is not even sufficient to address change in family resources/makeup. Two years is way too long.	A jump from \$5,000.00 to \$50,000.00 is absurd. That is a huge amount of assets someone could liquidize to better their situation.	No - there are no PBV units at my properties and I do not plan to add any		
Different utilities pricing across Salem. I know landlords who have resident who only pay a fraction of what my renters pay in west salem. RUBS here for a one person house can be 80-120 per month and other parts of Salem charge much less.				It really depends on the owner. 1 bedroom units from the 1970s are renting for 1000+ in Salem. Newer builds are renting for 1400 for an one bedroom. I think factoring everything and setting a prices only limits the renters to the neighborhood they can live in. Rents are raising to push out lower incomes and section 8 renters. It's wrong but its a way for landlord to keep low income out of nicer areas without violating fair housing guidelines by rejecting section 8.	Case by case. Some people need annual inspection but others don't.			No - there are no PBV units at my properties but I would consider adding PBV in the future	

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	In today's market renting a unit for \$500 is hard	I think they should have to verify all deductions	I feel that you may not get an honest answer		Tenants need to be held accountable just as landlords. I think every 2 years in some cases is not enough	I know that many tenants that receive 100% housing that own brand new cars big screen televisions and other things that the tax payers are paying for by upping the amounts means tax payers would be paying more	No - there are no PBV units at my properties and I do not plan to add any		
		This is a honesty based modification and that never works, trust but verify	I will not support any self verifications	Too subjective to opinions	Yearly certification is necessary	No self certifying		not knowledgeable on the PBV units	Please help educate property managers on your program. It would also help to treat Property Managers as independent contractors who are for profit. We are not a non profit and are not required to make all of the exceptions that are expected of us, not asked of us, expected of us. Our workload is already unmanageable and to add extra work is not going to work, nor is treating us like we are the enemy :(.
none	none	none	encourages fraud	don't understand	none	none	No - there are no PBV units at my properties but I would consider adding PBV in the future	don't understand	

Do you have any additional comments about the proposed Alternative Utility Allowance?	Do you have any additional comments about the Initial Rent Burden change to 50% of Adjusted Monthly Income?	Do you have any additional comments about the Modification of Deductions?	Do you have any additional comments about the Alternative Income Exclusion?	Do you have any additional comments about the proposed alternative Rent Reasonableness Process?	Do you have any additional comments about the Alternative Reexamination Schedule?	Do you have any additional comments about the Self-Certification of Assets up to \$50,000?	Do you currently have Project-Based Vouchers in any of your properties (from SHA or another Housing Authority)?	Do you have any additional comments about Limiting Portability for PBV units?	Thank you very much for taking the time to complete this survey! We appreciate your input about our planned MTW activities. If you have any additional comments, or ideas for future MTW activities...
No	This program should only be utilized as an emergency for those in the most desperate of circumstances.	People are not honest and often take advantage of scenarios like this.	This program should only be utilized as an emergency for those in the most desperate of circumstances.	The current process does not work anyways.	The schedule should stay annually.	People are not honest and often take advantage of scenarios like this.	No - there are no PBV units at my properties and I do not plan to add any	No	
I think it help simplify it, I don't worry about it. I have been asked to lower rent about \$50 a month and owner was willing.	I base them qualifying on their portion of rent and income	I place faith in you (section 8) doing screening on qualified to receive housing. Documentation is reasonable expectation.	All income should be reported to avoid taking advantage of the program		Accountability to beeligible for the program is needed a lot can change in 1 year. If they have a loss of income they can be reevaluated earlier.	most programs disqualify assistance if they have more than \$2000 in assets.	No - there are no PBV units at my properties and I do not plan to add any	PBV? I placed the hardest to house homeless? If they take away the no cause notice it will have a negative inpack on plaing at risk tenants	Thank you for all you do!

SHA Community Partner Survey

2

Responses

16:47

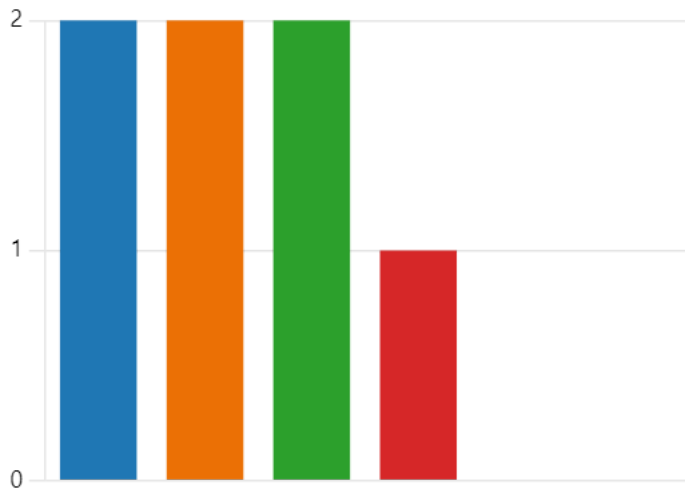
Average time to complete

Closed

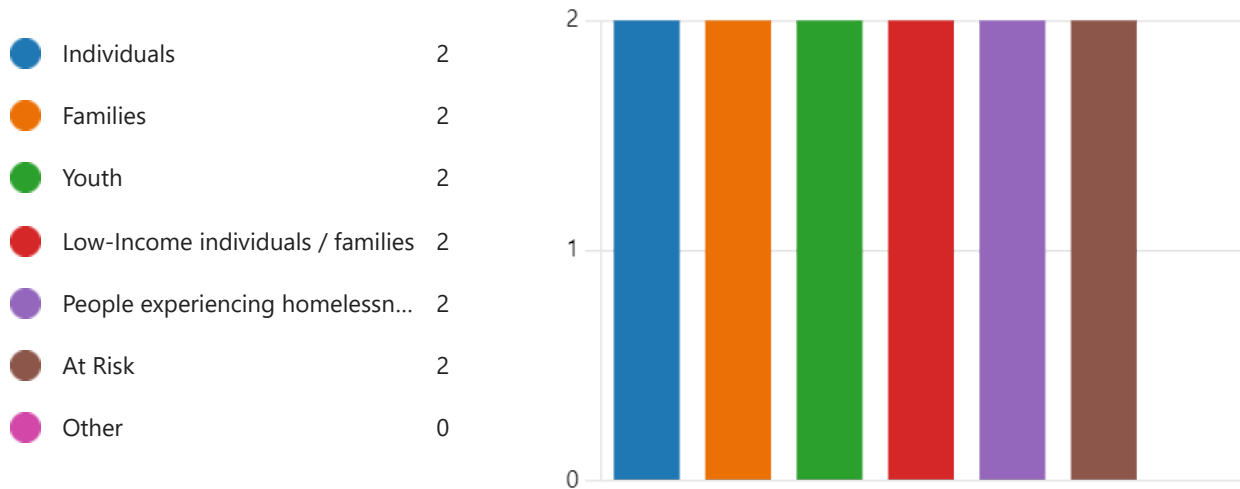
Status

1. Which areas are served by your organization? (Select all that apply)

- Salem, Oregon 2
- Keizer, Oregon 2
- Marion County, Oregon (other t... 2
- Polk County, Oregon (other tha... 1
- Other counties in Oregon 0
- Outside of Oregon 0



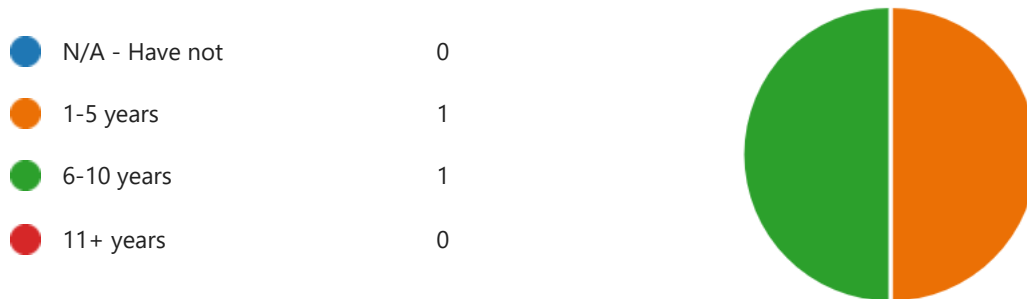
2. Who does your organization serve? (Check all that apply)



3. Have you ever worked with Salem Housing Authority in any capacity?



4. How long have you worked with Salem Housing Authority?



5. **Alternative Utility Allowance** - The current utility allowance schedule used by Salem Housing Authority accounts for various utility scenarios based upon utility provider, housing type, housing location. It is extensive and can be challenging to use. SHA is proposing to create a simplified utility allowance schedule that is based upon average expenses for the most common fuel types for heating, cooking, and water heating from the suppliers in our jurisdiction. These amounts would be averaged for each unit size and housing type.

Here is an example:

Under the current utility schedule, for a 1-bedroom apartment where the tenant pays electricity and has gas heat, gas cooking, and an electric water heater, and pays a utility chargeback for water and trash, the cost of each of these utility items would have to be added to arrive at the total utility allowance.

Under the proposed utility schedule, there would be an average cost for utilities for a 1-bedroom apartment where the tenant is responsible for basic electricity, heating, cooking, and water heating. There would be a standard flat fee, based on community averages, for the utility chargeback. Only two numbers would have to be added to arrive at the utility allowance.

In your opinion, would the Alternative Utility Allowance have a positive, neutral, or negative effect on the people served by our programs?



6. Do you have any additional comments about the proposed **Alternative Utility Allowance**?

1
Responses

Latest Responses

"Education needs to be offered to both potential client as well a...

7. **Initial Rent Burden** - Currently, HUD regulations prohibit SHA from approving a tenancy if the tenant's total housing cost (rent + utilities) exceeds 40% of their monthly adjusted income. SHA is proposing to change the Initial Rent Burden cap from 40% of adjusted monthly income to 50% adjusted monthly income to promote housing choice. Program participants would receive information about the risks of higher rent burden so they could make an informed choice.

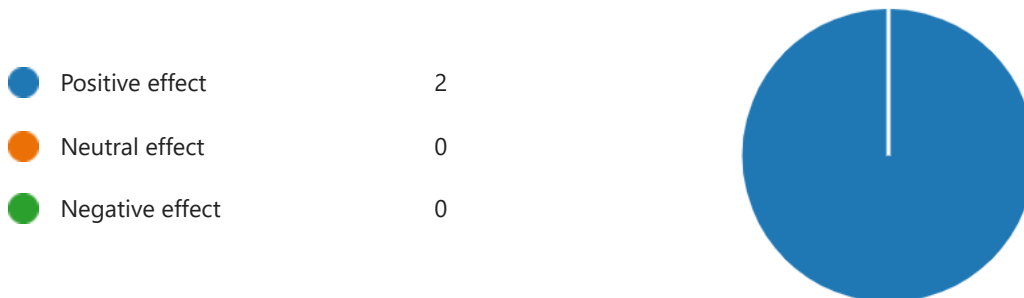
"Adjusted Monthly Income" means the household's gross monthly income minus any allowable deductions for dependents, elderly/disabled households, medical expenses, and/or childcare. Non-cash benefits, like SNAP (food stamps) are not included in this calculation.

For example:

If a household's Adjusted Monthly Income is \$1,000, under the current rule, they could not lease a unit where their total housing cost (rent + utilities) was more than \$400.

Under the new rule, the household could not lease a unit where their total housing cost (rent + utilities) was more than \$500.

In your opinion, would the Initial Rent Burden of 50% of Monthly Adjusted Income have a positive, neutral, or negative effect on the people served by our programs?



8. Do you have any additional comments about the **Initial Rent Burden change to 50% of Adjusted Monthly Income?**

1
Responses

Latest Responses

"Difficult for persons having to spend up to 50% of adjusted mo...

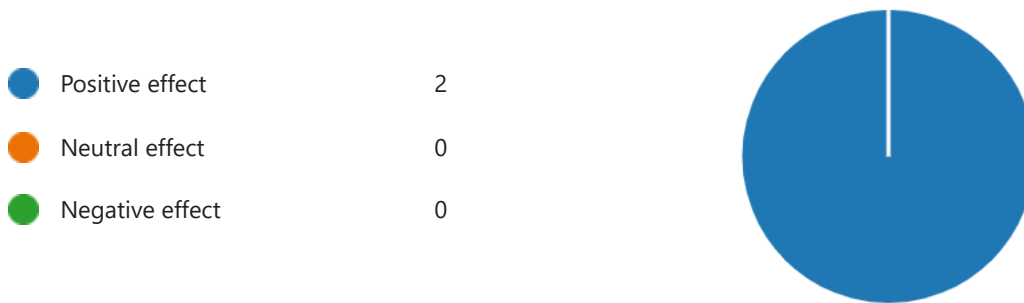
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\$5,000 annually for unreimbursed childcare costs

Households could still claim expenses that are over the threshold for self-certification by providing third party documentation. Information that is self-certified could also be verified at SHA's discretion.

Do you feel that the modification of deductions would have a positive, neutral, or negative effect on the people served by our programs?



10. Do you have any additional comments about the **Modification of Deductions?**

1
Responses

Latest Responses

"Lessens the burden to access verification of medical expenses ..."

11. **Alternative Income Exclusions** - HUD regulations require the inclusion of regular non-cash contributions to the household (excluding food or reimbursement for medical expenses). In some cases, the inclusion of non-cash contributions to the household may result in tenant rent responsibility when the household has no cash resources with which to pay rent, resulting in a situation that puts the household at risk for eviction for non-payment of rent, or having to seek other means of obtaining cash contributions, which could then be considered unreported income. This is especially challenging for tenants of Permanent Supportive Housing (PSH) projects where there are typically no tenant-paid utilities, so any amount of income creates a rent obligation for the family.

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Cash contributions would still be included in the household's income calculation.

Do you feel that excluding up to \$2000 of non-cash contributions annually from the household's income would have a positive, neutral, or negative effect on the people served by our programs?



12. Do you have any additional comments about the **Alternative Income Exclusion**?

0

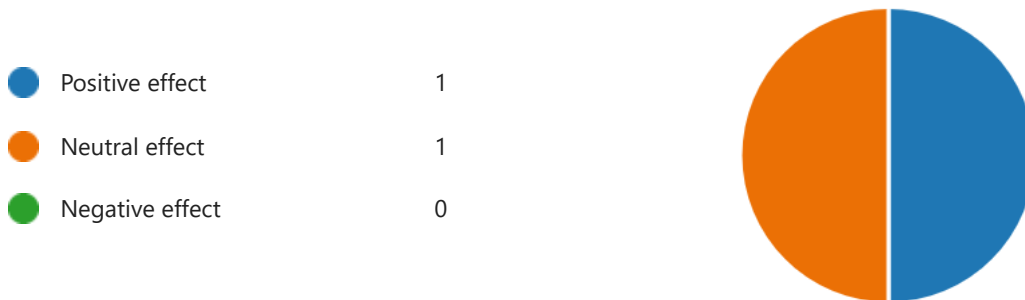
Responses

Latest Responses

13. **Rent Reasonableness Process** - Current rent reasonableness practices require the PHA to maintain a database of comparable units. The administrative burden of maintaining such a database and keeping information regarding comparable units up to date is overwhelming, especially in a volatile rental market where prices change almost daily.

SHA seeks to implement a unit-to-market rent reasonableness process, using semi-annual market studies conducted by a contracted organization. The market study will consider: location of the unit (zip code and neighborhood), type of unit (single family detached and multifamily/shared wall), age of unit (defined as pre-1990 and post-1990). Contract rent for the assisted unit will be compared against the most recent study, and if it falls within the range defined in the market study it will be considered reasonable. Housing Inspectors and other knowledgeable PHA staff may use their market knowledge on a case-by-case basis to approve requested rents above the amount stated in the study for the particular housing type in its area (for example, if a pre-1990 unit has been renovated and is closer in condition to a post-1990 unit, the post-1990 amount may be used to determine reasonableness). Likewise, staff may use market knowledge to disapprove of a requested rent amount if the assisted unit is known to be in poor condition or have sub-standard upkeep.

Do you feel that the alternative Rent Reasonableness Process would have a positive, neutral, or negative effect on the people served by our programs?



14. Do you have any additional comments about the proposed **alternative Rent Reasonableness Process**?

0
Responses

Latest Responses

15. **Alternative Reexamination Schedule for Households** - Currently, SHA recertifies each household's eligibility annually. SHA seeks to conduct reexaminations on a biennial (every 2 years) basis rather than annually.

Do you feel the Alternative Reexamination Schedule would have a positive, neutral, or negative effect on the people served by our programs?

● Positive effect	1
● Neutral effect	0
● Negative effect	1



16. Do you have any additional comments about the **Alternative Reexamination Schedule?**

1
Responses

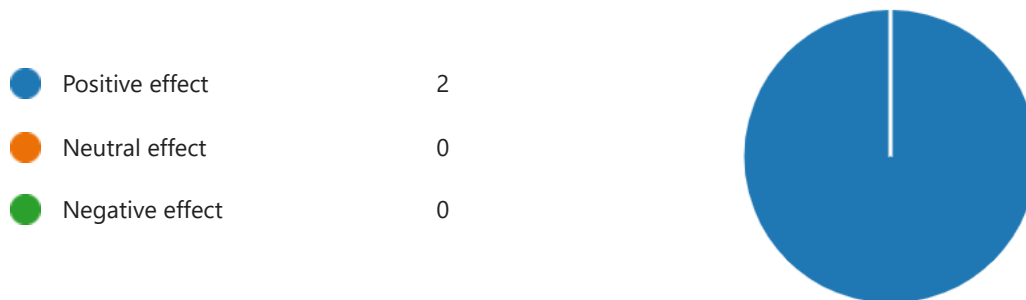
Latest Responses

"How might this impact those that are part of the Self Sufficien..."

17. **Self-Certification of Assets** - Currently, households may self-certify the value of their assets if their total assets are valued at \$5,000 or less. Actual asset values must be verified by third party verification at least once every three years. Typically this is accomplished by the household providing full bank statements.

SHA seeks to allow households to self-certify the value of their assets, up to \$50,000, at their recertification. Assets would be verified by third party documentation when the household's eligibility is first determined at program admission, but self-certification would be accepted in subsequent years. SHA will reserve the right to verify assets via third party if needed.

Do you feel the Self-Certification of Assets would have a positive, neutral, or negative impact on the people served by our programs?



18. Do you have any additional comments about the **Self-Certification of Assets up to \$50,000?**

0
Responses

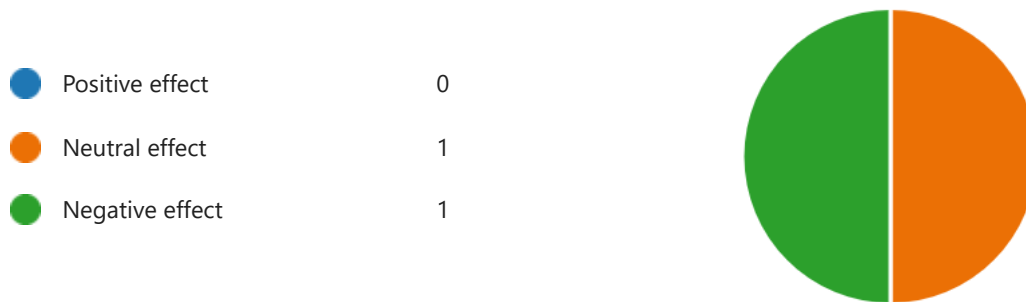
Latest Responses

19. **Limiting Portability for Project-Based Voucher (PBV) Units** - Currently, residents of Project-Based Voucher (PBV) units may request a Housing Choice Voucher after 12 months of tenancy in a PBV unit. Housing Choice Vouchers are very limited, and requests for move vouchers from PBV tenants are required to be processed before applicants from the waiting list are served.

SHA seeks to increase the requirement from 12 months of tenancy to 24 months.

Participants could request a Housing Choice Voucher earlier than 24 months if needed as a reasonable accommodation.

Do you feel that Limiting Portability for PBV Units would have a positive, neutral, or negative effect on the people served by our programs?



20. Do you have any additional comments about **Limiting Portability for PBV units?**

2
Responses

Latest Responses

*"If someone has to be in a project based unit for 24 months bef...
"Negative for some and positive for others "*

21. If you are interested in participating in future surveys or other opportunities to provide input, please provide your email address:

1
Responses

Latest Responses

"ajensen@co.marion.or.us"

22. **Thank you very much for taking the time to complete this survey!** We appreciate your input about our planned MTW activities.

If you have any additional comments, or ideas for future MTW activities that we could implement that would benefit the community, please let us know:

0

Responses

Latest Responses



SHA Staff Survey

23

Responses

20:13

Average time to complete

Closed

Status

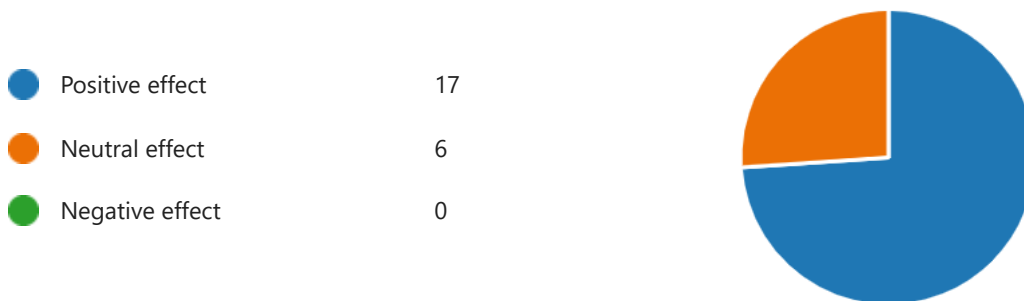
1. **Alternative Utility Allowance** - The current utility allowance schedule used by Salem Housing Authority accounts for various utility scenarios based upon utility provider, housing type, housing location. It is extensive and can be challenging to use. SHA is proposing to create a simplified utility allowance schedule that is based upon average expenses for the most common fuel types for heating, cooking, and water heating from the suppliers in our jurisdiction. These amounts would be averaged for each unit size and housing type.

Here is an example:

Under the current utility schedule, for a 1-bedroom apartment where the tenant pays electricity and has gas heat, gas cooking, and an electric water heater, and pays a utility chargeback for water and trash, the cost of each of these utility items would have to be added to arrive at the total utility allowance.

Under the proposed utility schedule, there would be an average cost for utilities for a 1-bedroom apartment where the tenant is responsible for basic electricity, heating, cooking, and water heating. There would be a standard flat fee, based on community averages, for the utility chargeback. Only two numbers would have to be added to arrive at the utility allowance.

In your opinion, would the Alternative Utility Allowance have a positive, neutral, or negative effect on the Public Housing or Voucher programs?



2. Do you have any additional comments about the proposed **Alternative Utility Allowance**?

9
Responses

Latest Responses

"sounds like a good idea to me"

"Not where I would focus my efforts or resources, but every littl...

"No"

3. **Initial Rent Burden** - Currently, HUD regulations prohibit SHA from approving a tenancy if the tenant's total housing cost (rent + utilities) exceeds 40% of their monthly adjusted income. SHA is proposing to change the Initial Rent Burden cap from 40% of adjusted monthly income to 50% adjusted monthly income to promote housing choice. Program participants would receive information about the risks of higher rent burden so they could make an informed choice.

"Adjusted Monthly Income" means the household's gross monthly income minus any allowable deductions for dependents, elderly/disabled households, medical expenses, and/or childcare. Non-cash benefits, like SNAP (food stamps) are not included in this calculation.

For example:

If a household's Adjusted Monthly Income is \$1,000, under the current rule, they could not lease a unit where their total housing cost (rent + utilities) was more than \$400.

Under the new rule, the household could not lease a unit where their total housing cost (rent + utilities) was more than \$500.

In your opinion, would the Initial Rent Burden of 50% of Monthly Adjusted Income have a positive, neutral, or negative effect on the Public Housing or Voucher Programs?



4. Do you have any additional comments about the **Initial Rent Burden change to 50% of Adjusted Monthly Income?**

10
Responses

Latest Responses

"no"

"this increase is minimal and it will cause more people to depe..."

"No"

5. **Modification of Deductions** - For households that qualify for deductions for medical/disability expenses and childcare, third party documentation is required. This process is often cumbersome for the household as they have to gather documentation to verify their expenses. SHA proposes to accept self-certification of expenses up to:

\$3,500 annually for out of pocket medical/disability expenses

\$5,000 annually for unreimbursed childcare costs

Households could still claim expenses that are over the threshold for self-certification by providing third party documentation. Information that is self-certified could also be verified at SHA's discretion.

Do you feel that the modification of deductions would have a positive, neutral, or negative effect on the Public Housing or Voucher Programs?



6. Do you have any additional comments about the **Modification of Deductions?**

8
Responses

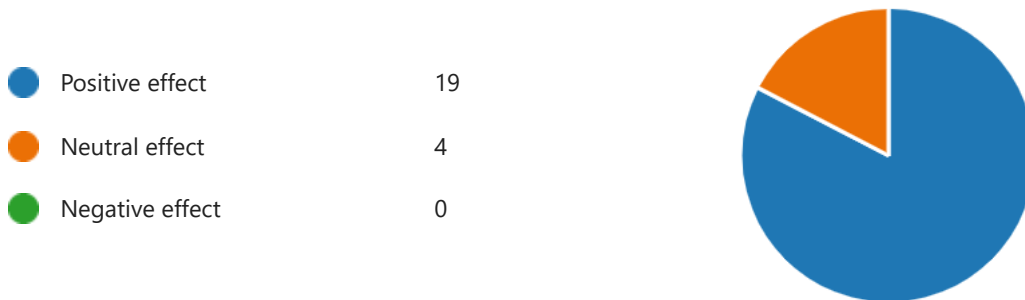
Latest Responses
 "no"
 "Much faster and less cumbersome. "
 "No"

7. **Alternative Income Exclusions** - HUD regulations require the inclusion of regular non-cash contributions to the household (excluding food or reimbursement for medical expenses). In some cases, the inclusion of non-cash contributions to the household may result in tenant rent responsibility when the household has no cash resources with which to pay rent, resulting in a situation that puts the household at risk for eviction for non-payment of rent, or having to seek other means of obtaining cash contributions, which could then be considered unreported income. This is especially challenging for tenants of Permanent Supportive Housing (PSH) projects where there are typically no tenant-paid utilities, so any amount of income creates a rent obligation for the family.

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Cash contributions would still be included in the household's income calculation.

Do you feel that excluding up to \$2000 of non-cash contributions annually from the household's income would have a positive, neutral, or negative effect on the Public Housing or Voucher programs?



8. Do you have any additional comments about the **Alternative Income Exclusion**?

7
Responses

Latest Responses

"great idea, love it, no notes."

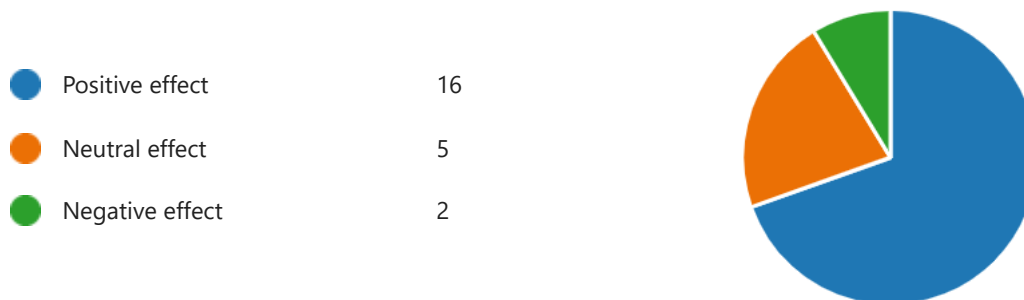
"This makes so much more sense in our economy today. People ...

"No"

9. **Rent Reasonableness Process** - Current rent reasonableness practices require the PHA to maintain a database of comparable units. The administrative burden of maintaining such a database and keeping information regarding comparable units up to date is overwhelming, especially in a volatile rental market where prices change almost daily.

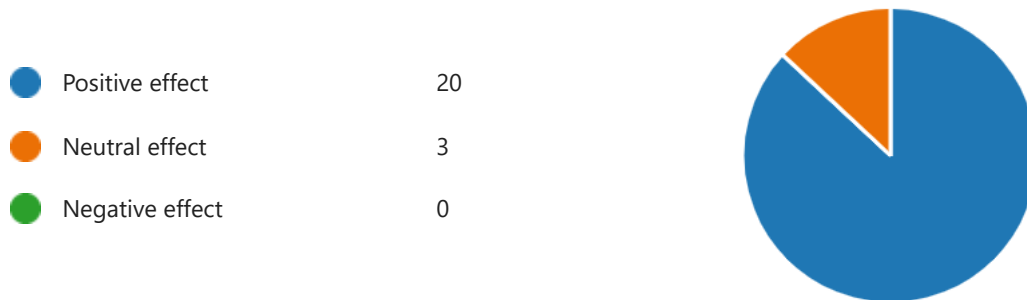
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Do you feel that the alternative Rent Reasonableness Process would have a positive, neutral, or negative effect on the Voucher program?



10. **Rent Reasonableness - Elimination of Third Party Requirement** - Currently, HUD regulations require that SHA obtain third-party certification of rent reasonableness for units that it owns or controls that are leased under the Voucher program. SHA seeks to eliminate this requirement (so we can conduct our own Rent Reasonableness determinations). A percentage of determinations would be subject to quality control from an outside organization (such as a neighboring PHA).

Do you feel that eliminating the Third Party Requirement for Rent Reasonableness would have a positive, neutral, or negative effect on the Voucher program?



11. Do you have any additional comments about the proposed **alternative Rent Reasonableness Process or Elimination of the Third Party Requirement?**

6
Responses

Latest Responses

"no"

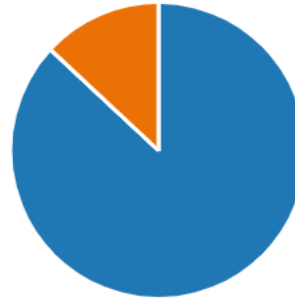
"Less administrative burden, but more of a chance for bias in m...

"No"

12. **Alternative Reexamination Schedule for Households** - Currently, SHA recertifies each household's eligibility annually. SHA seeks to conduct reexaminations on a biennial (every 2 years) basis rather than annually.

Do you feel the Alternative Reexamination Schedule would have a positive, neutral, or negative effect on the Public Housing or Voucher Programs?

● Positive effect	20
● Neutral effect	3
● Negative effect	0



13. Do you have any additional comments about the **Alternative Reexamination Schedule?**

9
Responses

Latest Responses

"no"

"I am not certain if it would make recerts more cumbersome or ..."

"No"

14. **Self-Certification of Assets** - Currently, households may self-certify the value of their assets if their total assets are valued at \$5,000 or less. Actual asset values must be verified by third party verification at least once every three years. Typically this is accomplished by the household providing full bank statements.

SHA seeks to allow households to self-certify the value of their assets, up to \$50,000, at their recertification. Assets would be verified by third party documentation when the household's eligibility is first determined at program admission, but self-certification would be accepted in subsequent years. SHA will reserve the right to verify assets via third party if needed.

Do you feel the Self-Certification of Assets would have a positive, neutral, or negative impact on the people served by our programs?



15. Do you have any additional comments about the **Self-Certification of Assets up to \$50,000?**

5
Responses

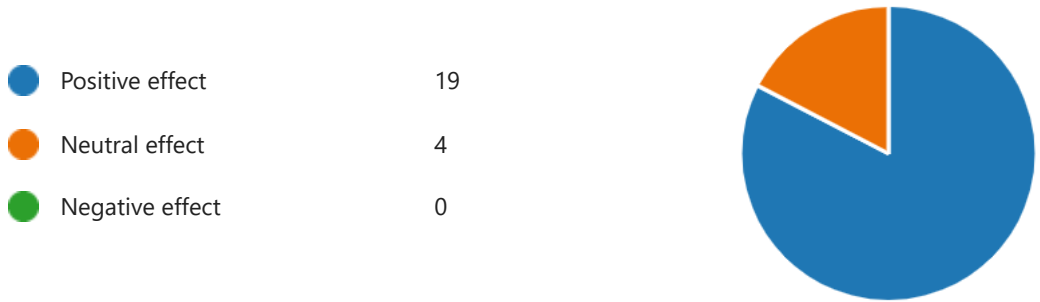
Latest Responses

"no"

"No"

16. **Housing Quality Standards Inspections - Elimination of Third Party Requirement -** Currently, SHA is required to have HQS inspections conducted by a third party for any units that we own or control. We are asking to eliminate this requirement (so we can complete our own HQS inspections in units we own/control). A percentage of the units inspected would be subject to independent quality control by a third party (like a neighboring PHA).

Do you feel the elimination of the Third Party Requirement for HQS Inspections would have a positive, neutral, or negative effect on the Voucher program?



17. Question

3
Responses

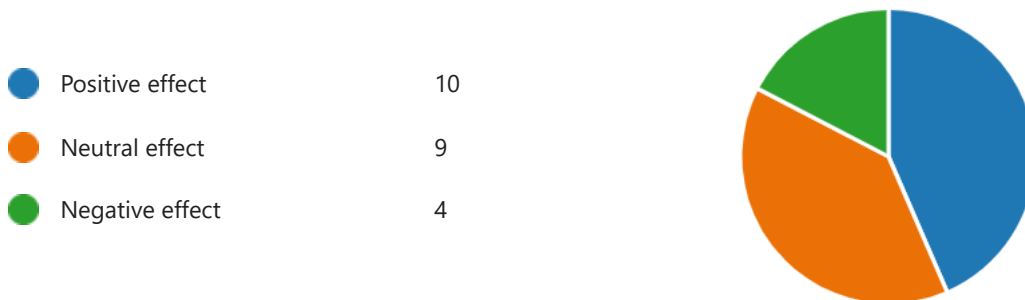
Latest Responses
"my answer"

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Participants could request a Housing Choice Voucher earlier than 24 months if needed as a reasonable accommodation.

Do you feel that Limiting Portability for PBV Units would have a positive, neutral, or negative effect on the Voucher program?



19. Do you have any additional comments about **Limiting Portability for PBV units?**

6
Responses

Latest Responses

- "how would this help the client? limiting people's ability to mov...*
- "one year already seems long. PBV is a great way to train up te...*
- "No"*

20. **Thank you very much for taking the time to complete this survey!** We appreciate your input about our planned MTW activities.

If you have any additional comments, or ideas for future MTW activities that we could implement that would benefit the community, please let us know:

5
Responses

Latest Responses

"I like most of these ideas! Cheers!"

"Reduce administrative burden and environmental burden by g..."

Salem Housing Authority - Program Participant Survey

82

Responses

14:21

Average time to complete

Closed

Status

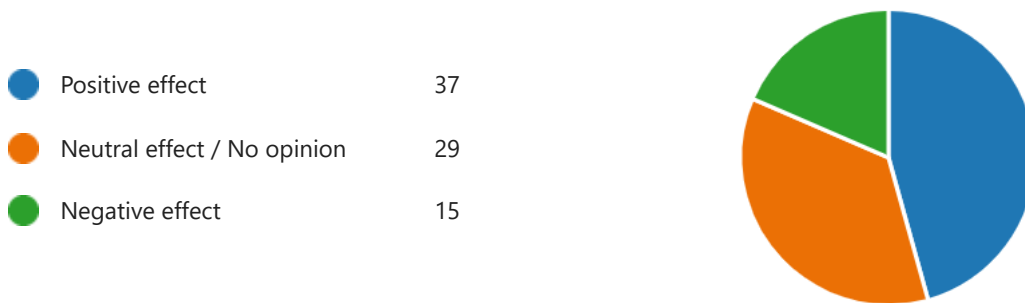
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In your opinion, would the Alternative Utility Allowance have a positive, neutral, or negative effect on the Public Housing or Voucher programs?



2. Do you have any additional comments about the proposed **Alternative Utility Allowance**?

34
Responses

Latest Responses
"No"

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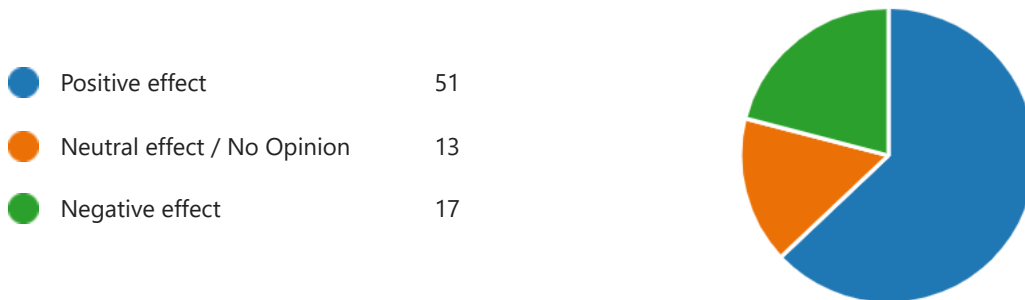
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4. Do you have any additional comments about the **Initial Rent Burden change to 50% of Adjusted Monthly Income?**

34

Responses

Latest Responses

"No"

"Don't understand this "

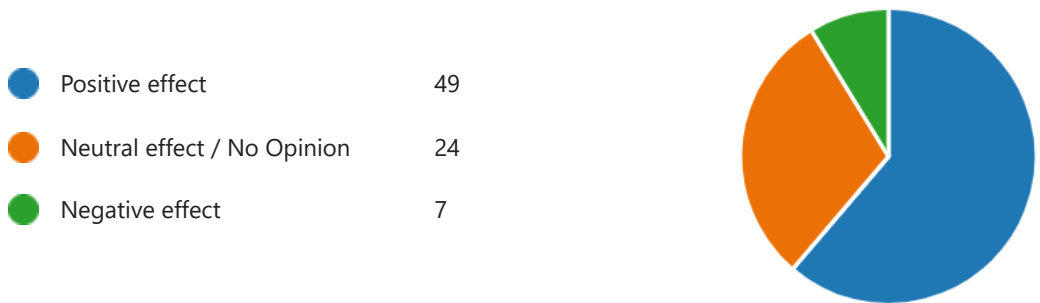
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Do you feel that the modification of deductions would have a positive, neutral, or negative effect on the Public Housing or Voucher Programs?



6. Do you have any additional comments about the **Modification of Deductions?**

30
Responses

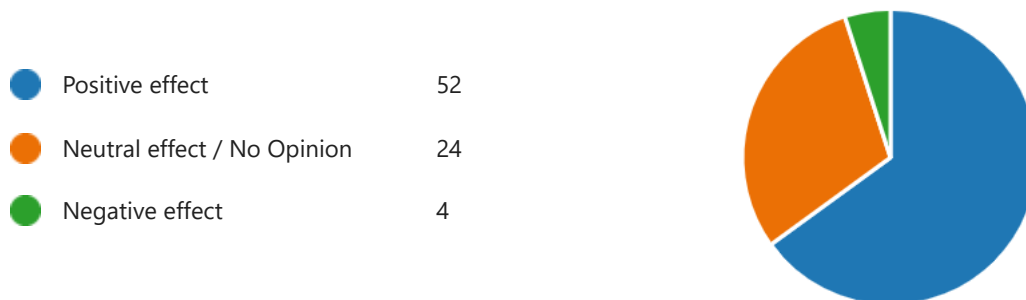
Latest Responses
"No"
"Don't understand "

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8. Do you have any additional comments about the **Alternative Income Exclusion**?

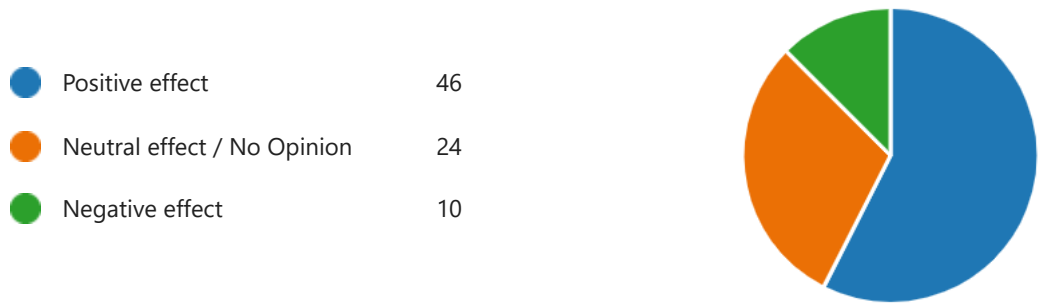
17
Responses

Latest Responses
"No"
"You should explain more "

- 9. **Rent Reasonableness Process (Voucher Program Only)** - Current rent reasonableness practices require the PHA to maintain a database of comparable units. The administrative burden of maintaining such a database and keeping information regarding comparable units up to date is overwhelming, especially in a volatile rental market where prices change almost daily.

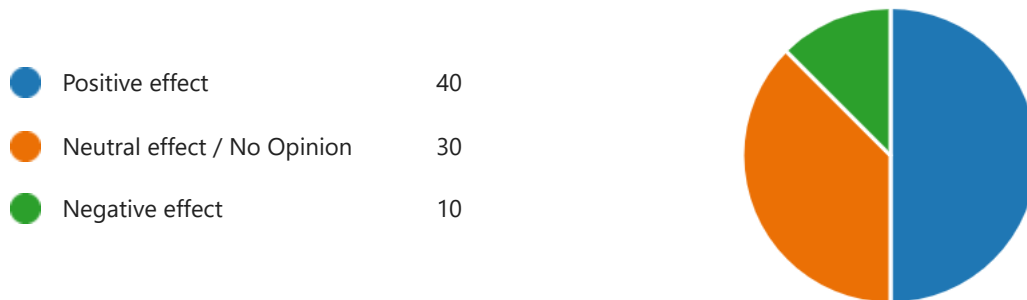
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Do you feel that eliminating the Third Party Requirement for Rent Reasonableness would have a positive, neutral, or negative effect on the Voucher program?



11. Do you have any additional comments about the proposed **alternative Rent Reasonableness Process or Elimination of the Third Party Requirement?**

22
Responses

Latest Responses
"No"

12. **Alternative Reexamination Schedule for Households** - Currently, SHA recertifies each household's eligibility annually. SHA seeks to conduct reexaminations on a biennial (every 2 years) basis rather than annually.

Do you feel the Alternative Reexamination Schedule would have a positive, neutral, or negative effect on the Public Housing or Voucher Programs?

● Positive effect	64
● Neutral effect / No Opinion	11
● Negative effect	4



13. Do you have any additional comments about the **Alternative Reexamination Schedule?**

25
Responses

Latest Responses

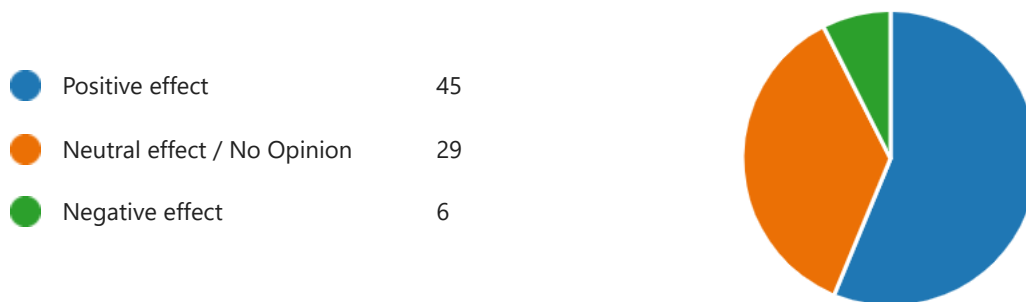
"No"

"We will get recertification every two years instead of every yea..."

14. **Self-Certification of Assets** - Currently, households may self-certify the value of their assets if their total assets are valued at \$5,000 or less. Actual asset values must be verified by third party verification at least once every three years. Typically this is accomplished by the household providing full bank statements.

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Do you feel the Self-Certification of Assets would have a positive, neutral, or negative impact on the people served by our programs?



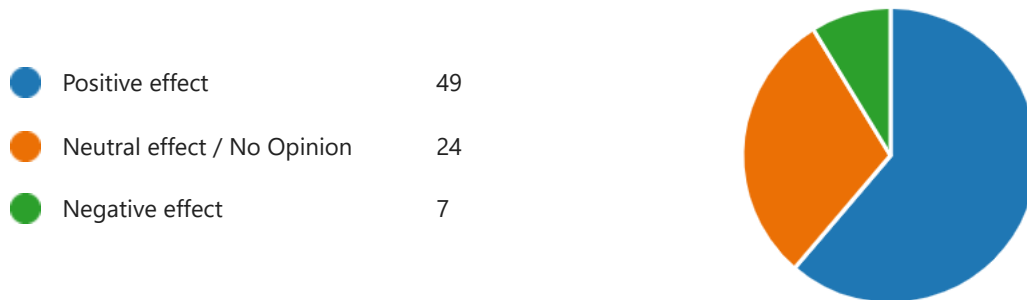
15. Do you have any additional comments about the **Self-Certification of Assets up to \$50,000?**

18
Responses

Latest Responses
"No"

16. **Housing Quality Standards Inspections - Elimination of Third Party Requirement (Voucher Program Only)** - Currently, SHA is required to have HQS inspections conducted by a third party for any units that we own or control. We are asking to eliminate this requirement (so we can complete our own HQS inspections in units we own/control). A percentage of the units inspected would be subject to independent quality control by a third party (like a neighboring PHA).

Do you feel the elimination of the Third Party Requirement for HQS Inspections would have a positive, neutral, or negative effect on the Voucher program?



17. Question

16
Responses

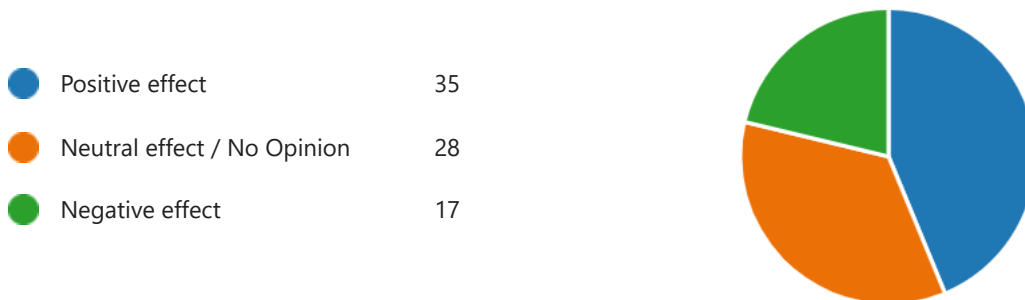
Latest Responses
"No"

18. **Limiting Portability for Project-Based Voucher (PBV) Units (Voucher Program Only)**- Currently, residents of Project-Based Voucher (PBV) units may request a Housing Choice Voucher after 12 months of tenancy in a PBV unit. Housing Choice Vouchers are very limited, and requests for move vouchers from PBV tenants are required to be processed before applicants from the waiting list are served.

SHA seeks to increase the requirement from 12 months of tenancy to 24 months.

Participants could request a Housing Choice Voucher earlier than 24 months if needed as a reasonable accommodation.

Do you feel that Limiting Portability for PBV Units would have a positive, neutral, or negative effect on the Voucher program?



19. Do you have any additional comments about **Limiting Portability for PBV units?**

18
Responses

Latest Responses
"No"

20. **Thank you very much for taking the time to complete this survey!** We appreciate your input about our planned MTW activities.

If you have any additional comments, or ideas for future MTW activities that we could implement that would benefit the community, please let us know:

18
Responses

Latest Responses

"It's very confusing what you plan to do. Caseworker might wan..."

SHA MTW Property Owner/Manager Survey

16

Responses

10:35

Average time to complete

Closed

Status

1. How many rental units do you own/manage?

15

Responses

Latest Responses

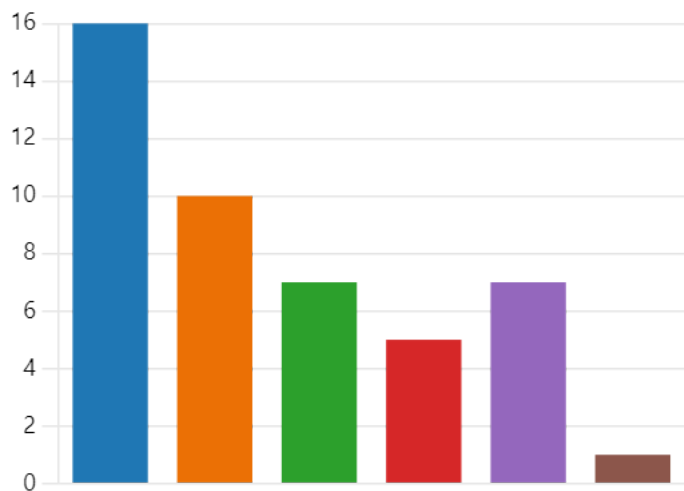
"Over 500 in the Salem Keizer area"

"132"

"620"

2. Where are the units that you own/manage? (Select all that apply)

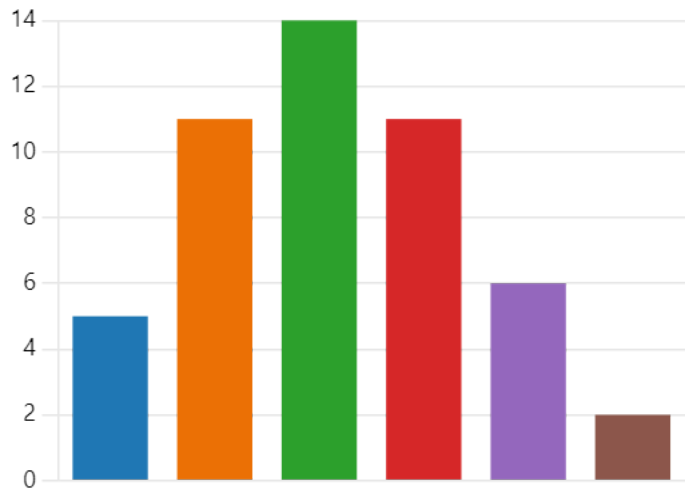
- Salem, Oregon 16
- Keizer, Oregon 10
- Marion County, Oregon (other t... 7
- Polk County, Oregon (other tha... 5
- Other counties in Oregon 7
- Outside of Oregon 1



3. How many bedrooms do your rental units have? (Select all that apply)

- Studio / Zero Bedrooms
- 1-bedroom
- 2-bedroom
- 3-bedroom
- 4-bedroom
- 5+ bedrooms

5
11
14
11
6
2



4. Are *most* of your rental units multi-family dwellings (apartments, condos, duplexes, triplexes), or single family homes?

- Multi-family
- Single family

12
4



5. How long have you owned/managed rental properties?

- Less than 2 years
- 2-5 years
- 5-15 years
- More than 15 years

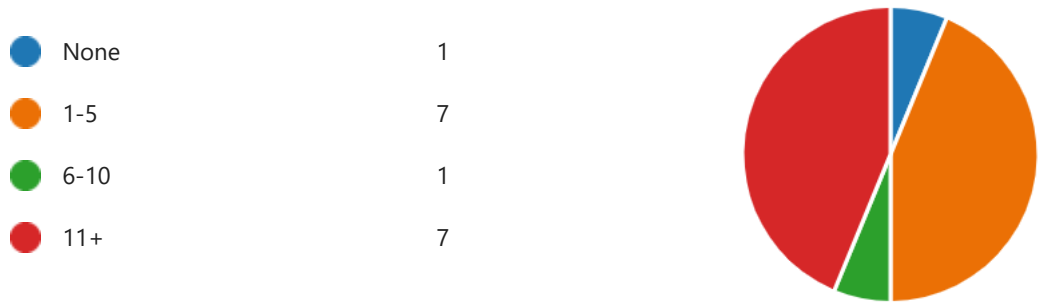
0
1
2
13



6. Have you ever worked with SHA's Housing Choice Voucher (Section 8) program?



7. How many rental units do you currently have with Section 8 renters?



8. **Alternative Utility Allowance** - The current utility allowance schedule used by Salem Housing Authority accounts for various utility scenarios based upon utility provider, housing type, housing location. It is extensive and can be challenging to use. SHA is proposing to create a simplified utility allowance schedule that is based upon average expenses for the most common fuel types for heating, cooking, and water heating from the suppliers in our jurisdiction. These amounts would be averaged for each unit size and housing type.

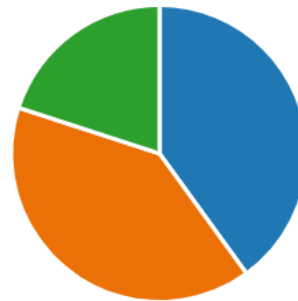
Here is an example:

Under the current utility schedule, for a 1-bedroom apartment where the tenant pays electricity and has gas heat, gas cooking, and an electric water heater, and pays a utility chargeback for water and trash, the cost of each of these utility items would have to be added to arrive at the total utility allowance.

Under the proposed utility schedule, there would be an average cost for utilities for a 1-bedroom apartment where the tenant is responsible for basic electricity, heating, cooking, and water heating. There would be a standard flat fee, based on community averages, for the utility chargeback. Only two numbers would have to be added to arrive at the utility allowance.

In your opinion, would the Alternative Utility Allowance have a positive, neutral, or negative effect on your business as a property owner or manager?

● Positive effect	6
● Neutral effect	6
● Negative effect	3



9. Do you have any additional comments about the proposed **Alternative Utility Allowance**?

7

Responses

Latest Responses

10. **Initial Rent Burden** - Currently, HUD regulations prohibit SHA from approving a tenancy if the tenant's total housing cost (rent + utilities) exceeds 40% of their monthly adjusted income. SHA is proposing to change the Initial Rent Burden cap from 40% of adjusted monthly income to 50% adjusted monthly income to promote housing choice.

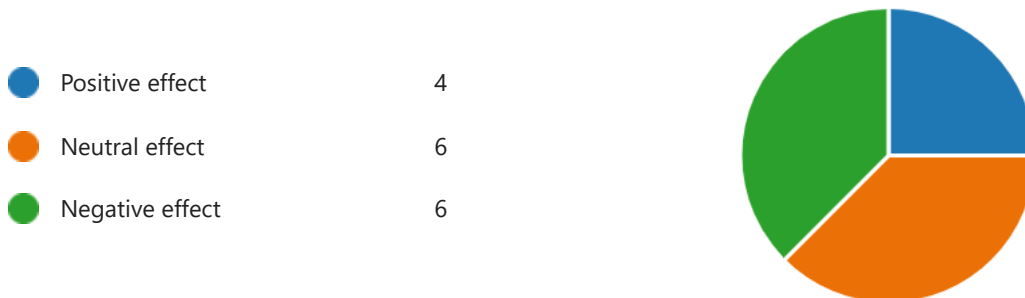
"Adjusted Monthly Income" means the household's gross monthly income minus any allowable deductions for dependents, elderly/disabled households, medical expenses, and/or childcare. Non-cash benefits, like SNAP (food stamps) are not included in this calculation.

For example:

If a household's Adjusted Monthly Income is \$1,000, under the current rule, they could not lease a unit where their total housing cost (rent + utilities) was more than \$400.

Under the new rule, the household could not lease a unit where their total housing cost (rent + utilities) was more than \$500.

In your opinion, would the Initial Rent Burden of 50% of Monthly Adjusted Income have a positive, neutral, or negative effect on your business as a property owner or manager?



11. Do you have any additional comments about the **Initial Rent Burden change to 50% of Adjusted Monthly Income?**

5
Responses

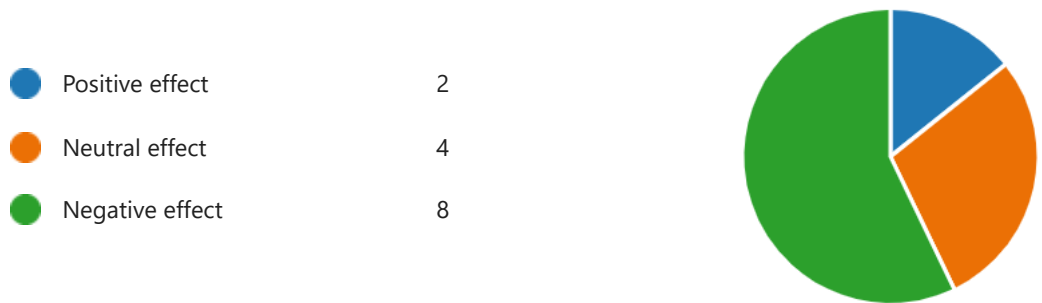
Latest Responses

12. **Modification of Deductions** - For households that qualify for deductions for medical/disability expenses and childcare, third party documentation is required. This process is often cumbersome for the household as they have to gather documentation to verify their expenses. SHA proposes to accept self-certification of expenses up to:

- \$3,500 annually for out of pocket medical/disability expenses
- \$5,000 annually for unreimbursed childcare costs

Households could still claim expenses that are over the threshold for self-certification by providing third party documentation. Information that is self-certified could also be verified at SHA's discretion.

Do you feel that the modification of deductions would have a positive, neutral, or negative effect on your business as a property owner or manager?



13. Do you have any additional comments about the **Modification of Deductions?**

6
Responses

Latest Responses

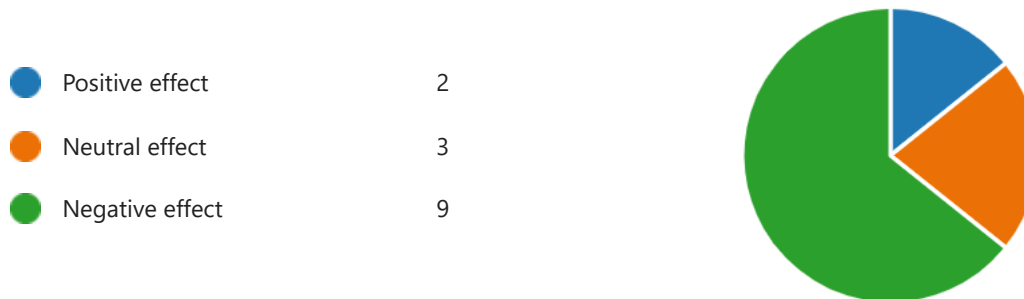
"This is a honesty based modification and that never works, tru...

14. **Alternative Income Exclusions** - HUD regulations require the inclusion of regular non-cash contributions to the household (excluding food or reimbursement for medical expenses). In some cases, the inclusion of non-cash contributions to the household may result in tenant rent responsibility when the household has no cash resources with which to pay rent, resulting in a situation that puts the household at risk for eviction for non-payment of rent, or having to seek other means of obtaining cash contributions, which could then be considered unreported income. This is especially challenging for tenants of Permanent Supportive Housing (PSH) projects where there are typically no tenant-paid utilities, so any amount of income creates a rent obligation for the family.

SHA seeks to exclude from income regular contributions made by someone outside of the assisted household that are not cash paid directly to a member of the household and total \$2000 or less annually. Regular cash contributions to the household would still be included in the income calculation. Self-certification of non-cash contributions to the household up to \$2,000 annually will be accepted as verification of these amounts.

Cash contributions would still be included in the household's income calculation.

Do you feel that excluding up to \$2000 of non-cash contributions annually from the household's income would have a positive, neutral, or negative effect on your business as a property owner or manager?



15. Do you have any additional comments about the **Alternative Income Exclusion**?

5
Responses

Latest Responses
"I will not support any self verifications"

16. **Rent Reasonableness Process** - Current rent reasonableness practices require the PHA to maintain a database of comparable units. The administrative burden of maintaining such a database and keeping information regarding comparable units up to date is overwhelming, especially in a volatile rental market where prices change almost daily.

SHA seeks to implement a unit-to-market rent reasonableness process, using semi-annual market studies conducted by a contracted organization. The market study will consider: location of the unit (zip code and neighborhood), type of unit (single family detached and multifamily/shared wall), age of unit (defined as pre-1990 and post-1990). Contract rent for the assisted unit will be compared against the most recent study, and if it falls within the range defined in the market study it will be considered reasonable. Housing Inspectors and other knowledgeable PHA staff may use their market knowledge on a case-by-case basis to approve requested rents above the amount stated in the study for the particular housing type in its area (for example, if a pre-1990 unit has been renovated and is closer in condition to a post-1990 unit, the post-1990 amount may be used to determine reasonableness). Likewise, staff may use market knowledge to disapprove of a requested rent amount if the assisted unit is known to be in poor condition or have sub-standard upkeep.

Do you feel that the alternative Rent Reasonableness Process would have a positive, neutral, or negative effect on your business as a property owner or manager?



17. Do you have any additional comments about the proposed **alternative Rent Reasonableness Process**?

5
Responses

Latest Responses
"Too subjective to opinions"

18. **Alternative Reexamination Schedule for Households** - Currently, SHA recertifies each household's eligibility annually. SHA seeks to conduct reexaminations on a biennial (every 2 years) basis rather than annually.

Do you feel the Alternative Reexamination Schedule would have a positive, neutral, or negative effect on your business as a property owner or manager?

● Positive effect	3
● Neutral effect	5
● Negative effect	7



19. Do you have any additional comments about the **Alternative Reexamination Schedule?**

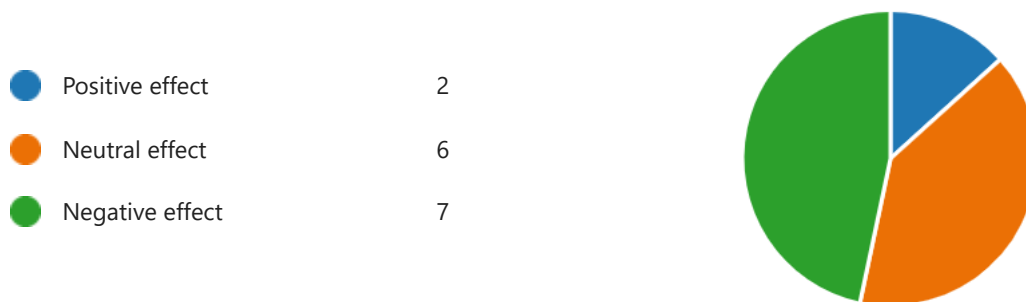
7
Responses

Latest Responses
"Yearly certification is necessary"

20. **Self-Certification of Assets** - Currently, households may self-certify the value of their assets if their total assets are valued at \$5,000 or less. Actual asset values must be verified by third party verification at least once every three years. Typically this is accomplished by the household providing full bank statements.

SHA seeks to allow households to self-certify the value of their assets, up to \$50,000, at their recertification. Assets would be verified by third party documentation when the household's eligibility is first determined at program admission, but self-certification would be accepted in subsequent years. SHA will reserve the right to verify assets via third party if needed.

Do you feel the Self-Certification of Assets would have a positive, neutral, or negative impact on your business as a property owner or manager?



21. Do you have any additional comments about the **Self-Certification of Assets up to \$50,000?**

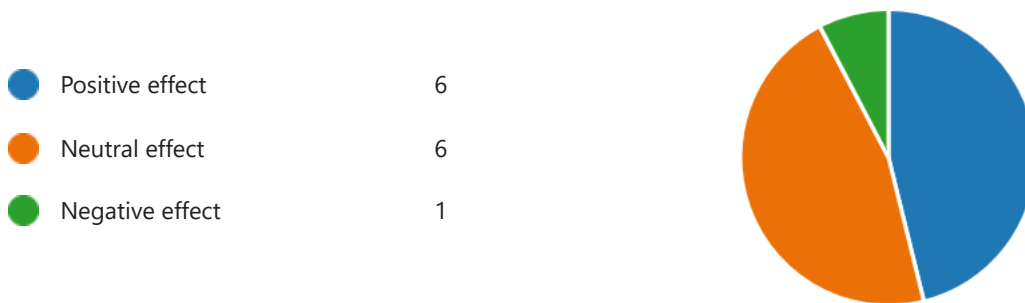
6
Responses

Latest Responses
"No self certifying"

22. **Limiting Portability for Project-Based Voucher (PBV) Units** - Currently, residents of Project-Based Voucher (PBV) units may request a Housing Choice Voucher after 12 months of tenancy in a PBV unit. Housing Choice Vouchers are very limited, and requests for move vouchers from PBV tenants are required to be processed before applicants from the waiting list are served.

SHA seeks to increase the requirement from 12 months of tenancy to 24 months.

Do you feel that Limiting Portability for PBV Units would have a positive, neutral, or negative effect on your business as a property owner or property manager?



23. Do you currently have Project-Based Vouchers in any of your properties (from SHA or another Housing Authority)?



24. Do you have any additional comments about **Limiting Portability for PBV units?**

4
Responses

Latest Responses
"not knowledgeable on the PBV units"

25. If you are interested in participating in future surveys or other opportunities to provide input, please provide your email address:

7
Responses

Latest Responses
"yes"
"monica@hsprops.net"

26. **Thank you very much for taking the time to complete this survey!** We appreciate your input about our planned MTW activities.

If you have any additional comments, or ideas for future MTW activities that we could implement that would benefit the community, please let us know:

4
Responses

Latest Responses
"Please help educate property mangers on your program. It wo..."
