PHA Name: WEST PALM BEACH HOUSING AUTHORITY

PHA Code: FL009

MTW Supplement for PHA Fiscal Year Beginning: (MM/DD/YYYY): 4/1/2025

PHA Program Type: Combined MTW Cohort Number: Asset Building

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The WPBHA is furthering the aforementioned statutory via the Asset Building Program, which provides a regular monthly payment of unrestricted dollars to randomly selected families and encouraging access to a comprehensive and complimentary educational program. The WPBHA and its community partners are actively meeting the statutory objectives of the MTW Program by (1) building and strengthening their household assets, (2) providing greater financial security and (3) assisting program participants move towards economic self-sufficiency.

The WPBHA has also progressed multiple waivers that have been designed to underpin the statutory objectives listed above. Progress on this work is provided in following pages but broadly, this work includes:

- Development of a Landlord incentives such as creating a damage mitigation fund to create incentives to encourage landlords to participate in the HCV program
- Issuing security deposit assistance fund to help participants lease-up faster
- Grow the impact of our work through use of fungibility available to the WPBHA as an MTW Agency, including but not limited to scoping the feasibility of new operational facilities to provide health services and other supportive services for residents of our developments and the surrounding community
- Updated income categories to align with IRS definitions

Implementation of the MTW waivers represents a shift in our policy, procedures and practice. However, our mission to provide 'safe, decent and affordable housing to persons and families with limited financial resources and provide residents with access to programs which will assist them in making the transition to greater financial security' remains unchanged. The WPBHA is excited to expand innovative service models that are only possible by the funding flexibility of local, non-tradition programs provided to us as an MTW agency.

Monitoring of the proposed waivers will be undertaken through available systems and other oversight tools available for such purposes. The WPBHA will embed practices which ensure our on-going compliance with the five (5) statutory requirements of MTW; (a) very low-income requirement, (b) reasonable rent policy, (c) substantially the same requirements, (d) comparable mix requirement and (e) housing quality standards. Specific analysis of affected statutory requirements is included as part of each waiver.

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).

submission year, plan to discontinue, previously discontin	nacaj.
1. Tenant Rent Policies	
e. Minimum Rent (PH)	Currently Implementing
f. Minimum Rent (HCV)	Plan to Implement in the Submission Year
v. Alternative Income Inclusions/Exclusions (PH)	Currently Implementing
w. Alternative Income Inclusions/Exclusions (HCV)	Currently Implementing
2. Payment Standards and Rent Reasonableness	
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)	Currently Implementing
d. Self-Certification of Assets (HCV)	Currently Implementing
4. Landlord Leasing Incentives	
b. Damage Claims (HCV-Tenant-based Assistance)	Currently Implementing
5. Housing Quality Standards (HQS)	
6. Short-Term Assistance	
7. Term-Limited Assistance	
8. Increase Elderly Age (PH & HCV)	
9. Project-Based Voucher Program Flexibilities	
10. Family Self-Sufficiency Program with MTW Flexibility	
11. MTW Self-Sufficiency Program	
12. Work Requirement	
13. Use of Public Housing as an Incentive for Economic F	Progress (PH)
14. Moving on Policy	
15. Acquisition without Prior HUD Approval (PH)	
16. Deconcentration of Poverty in Public Housing Policy	(PH)
17. Local, Non-Traditional Activities	
c. Housing Development Programs	Currently Implementing

C. MTW Activities Plan that WEST PALM BEACH HOUSING AUTHORITY Plans to Implement in the Submission Year or Is Currently Implementing

1.e. - Minimum Rent (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

The minimum rent is being raised from \$50 to \$130 for working, non-disabled, non-elderly households. Raising the minimum rent to \$130 is more in line with current market conditions and expectations.

Families with an elderly or disabled head-of-household will be excluded from the minimum rent policy.

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

Cost effectiveness

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

Neutral (no cost implications)

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

Does the MTW activity apply to all public housing developments?

The MTW activity applies to specific developments

Which developments participate in the MTW activity?

This waiver applies to FL009000056 Dunbar Village Project (a.k.a Sabal Palm) only.

As an elderly development, Southridge (FL009000022) residents are excluded from this activity.

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

Extensive work has been undertaken including:

- 1. Multiple staff trainings and discussions were held over the previous fiscal year to ensure staff understood the changes, were confident in talking to tenants about them and were across how to input the waiver requirements into the households' data in our client management system.
- 2. The WPBHA's ACOP was updated and approved by the WPBHA Board.
- 3. Briefing packets and other literature provided to tenants who reside Sabal Palm were updated
- 4. Notification to tenants at Sabal Palm of the changes and discussion with each household on the impacts to them took place late 2024

The \$130 minimum rent is effective from January 1st 2025.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

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

Yes

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

1.e. - Minimum Rent (PH); 1.f. - Minimum Rent (HCV); 3.a. - Alternative Reexamination Schedule for Households

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

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

No

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

No hardship were requested in the most recent fiscal year.

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

No

Does the MTW activity require an impact analysis?

Provided Already

How much is the minimum rent or minimum Total Tenant Payment (TTP)?

\$130.00

1.f. - Minimum Rent (HCV)

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

The WPBHA plans to increase its minimum rent from \$50 to \$130 to be more in line with current market conditions. This waiver does not include elderly or disabled head of households.

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

Cost effectiveness

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

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

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

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

Applies to all TPV and PBV vouchers.

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

Extensive work on implementation has been undertaken:

- 1. Multiple staff trainings and discussions were held over the previous fiscal year to ensure staff understood the changes, were confident in talking to tenants about them and were across how to input the waiver requirements into the households' data in our client management system.
- 2. The WPBHA's Administrative Plan has been updated and approved by the WPBHA Board.

- 3. Briefing packets, letters and other literature provided to participants have been updated.
- 4. Protracted discussions to resolve challenges with Software providers to ensure the Agency's client management system was able to support the implementation of this waiver without needing to establish system work arounds or shadow

Does this MTW activity require a hardship policy?

Provided Already

systems.

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

How much is the minimum rent or minimum Total Tenant Payment (TTP)?

\$130.00

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

Implementation of this waiver enables the WPBHA's income calculations to better reflect the changing technologies and methods of income payment. It was also intended to provide clarity to staff and promote consistency of practive.

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

Cost effectiveness

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

Increased revenue

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

The MTW activity applies to all assisted households

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

This waiver has been implemented and is operating as intended.

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

No

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

Cash App/Zelle/You Tube/Venmo (and similar) payments will be included in income calculations.

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

Implementation of this waiver enables the WPBHA's income calculations to better reflect changing technologies and methods of payment. It will also provide clarity to staff and promote consistency of practice.

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

Cost effectiveness

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

Increased revenue

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

The MTW activity applies to all assisted households

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

This waiver is implemented and operating as intended.

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

No

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

Cash App/Zelle/You Tube/Venmo (and similar) payments are included in income calculations.

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

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

The WPBHA intends to implement the alternative reexamination schedule for LIPH households. This waiver was intended to significantly reduce the administrative burden on our staff and customers.

It is also expected to provide greater incentive to work and as families will not be immediately subject to a rent increase when their income increases. Packaged with other activities aimed at self-sufficiency, the WPBHA envisioned this MTW

activity would incentivize families to increase their savings and build financial independence.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

Significant work was undertaken to operationalize this waiver including:

- 1. Multiple staff trainings and discussions were held over the previous fiscal year to ensure staff understood the changes, were confident in talking to tenants about them and were across how to input the waiver requirements into the households' data in our client management system.
- 2. The WPBHA's ACOP was updated and approved by the WPBHA Board.
- 3. Briefing packets and other literature provided to LIPH tenants were updated
- 4. Protracted discussions and challenges with Software providers to ensure the Agency's client management system was able to support the implementation of this waiver without needing to establish system work arounds or shadow systems.

However, after much consideration, the WPBHA has determined that it is best to pause the roll out of the biennial recertifications, so we are able to continue to use the existing 50058 form. If we were to use the 50058 - Expansion, as required by this waiver, we would experience operational disruptions and achieve the antithesis of what these waivers were meant to achieve by reducing the administrative burden for staff. Once we have clear and confirmed timelines from

HUD on the roll out of HIP, we are ready to initiate the roll out immediately.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Provided Already

What is the recertification schedule?

Once every two years

How many interim recertifications per year may a household request?

1

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

All other reporting of household changes will continue as before.

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

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

The WPBHA intends to implement the alternative reexamination schedule for HCV households. This waiver will significantly reduce the administrative burden on our staff and customers.

It is also expected to provide greater incentive to work and as families will not be immediately subject to a rent increase when their income increases. Packaged with other activities aimed at self-sufficiency, the WPBHA envisioned this activity

incentivizing families to increase their savings and build financial independence.

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

Cost effectiveness

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

what you know today.

Decreased expenditures

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

The MTW activity applies to all assisted households

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

Significant work was undertaken to operationalize this waiver including:

- 1. Multiple staff trainings and discussions were held over the previous fiscal year to ensure staff understood the changes, were confident in talking to tenants about them and were across how to input the waiver requirements into the households' data in our client management system.
- 2. The WPBHA's Administrative Plan was updated and approved by the WPBHA Board.
- 3. Briefing packets and other literature provided to HCV participants were updated
- 4. Protracted discussions and challenges with Software providers to ensure the Agency's client management system was able to support the implementation of this waiver without needing to establish system work arounds or shadow systems.

However, after much consideration, the WPBHA has determined that it is best to pause the roll out of the biennial recertifications, so we are able to continue to use the existing 50058 form. If we were to use the 50058 - Expansion, as required by this waiver, we would experience operational disruptions and achieve the antithesis of what these waivers were meant to achieve by reducing the administrative burden for staff. Once we have clear and confirmed timelines from

HUD on the roll out of HIP, we are ready to initiate the roll out immediately.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Provided Already

What is the recertification schedule?

Once every two years

How many interim recertifications per year may a household request?

1

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

All other interim changes to household will continue as before.

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

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

Enabling assisted families to self-certify their assets up to \$50,000 is consistent with the WPBHA's streamlining of income

calculation processes. It reduces the administrative burden on both our customers and our staff.

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.

This waiver is implemented and operating as intended.

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

No

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

\$50,000.

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

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

Enabling assisted families to self-certify their assets up to \$50,000 is consistent with the WPBHA's streamlining of income

calculation processes. It reduces the administrative burden on both our customers and our staff.

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.

Waiver is implemented and operating as intended.

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

No

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

\$50,000.

4.b. - Damage Claims (HCV-Tenant-based Assistance)

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

The WPBHA plans create a fund to help address damage claims. This is a onetime payment to landlords to encourage participation in the HCV program and may mitigate perceived risk of being an HCV landlord.

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

Housing choice

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

Increased revenue; Increased expenditures

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

The MTW activity applies to all assisted households

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

The process for the landlord damage claims has been drafted and is going through the necessary approval checks.

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

No

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

To all units

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

\$1000

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

0

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

\$0

17.c. - Housing Development Programs

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

The WPBHA plans to expand Affordable Housing by redeveloping and building additional affordable housing units on land it currently owns, and engage in development activities that will increase affordable housing in Palm Beach County

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

Housing choice

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

Increased revenue; Increased expenditures

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

The MTW activity applies to all assisted households

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

Not yet implemented

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

No

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

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Merry Place	Single family homes - New Construction	Construction financing	6.00	6.00	6.00	0.00	0.00	0.00

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

l i i i i i i i i i i i i i i i i i i i	Total Number of Units by Affordabilits of Units - 80% of AM		Number of Units by Affordability - Other
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Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year

	Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
-			Other						

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

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

		Vaiver(s) for which HU	• •		
E.2	Title	Has there been a change in how the waiver is being implemented from when it was originally approved?	Please provide a description of what has changed.	Please provide a description of the final outcomes and lessons learned from implementing this Activity at your PHA.	If the MTW Agency was previously required to prepare an impact analysis, was a final impact analysis prepared at the time of discontinuation?
	Asset Building Cohort	No			
	Asset Building Cohort	No			

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2024	\$63,501	\$63,501	\$0	2024-09-30

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

Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income	
49%-30% Area Median Income	
Below 30% Area Median Income	
Total Local, Non-Traditional Households	0

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

G.2 Establishing Reasonable Rent Policy.

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

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

I NAME/	BDB	_					TOTAL UNITS	POPULATION TYPE*	Type' is	# of Section 504 Accessible (Mobility)**	(**************************************	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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G.4 Comparable Mix (by Family Size) – Local, Non-Traditional.

To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix" of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.

Occupied Number of Local, Non-Traditional units by

Family Size:	Household Size
1 Person	
2 Person	
3 Person	
4 Person	
5 Person	
6+ Person	
Totals	0

H. Public Comment

Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.

Please see attached for an additional public hearing held for Agency-Specific Waiver(s) and/or Safe Harbor Waiver(s)

I. Evaluations.

No known evaluations.