

RIPLEY COUNTY PUBLIC HOUSING AGENCY

Moving to Work Demonstration Plan

The Ripley County Public Housing Agency (RCPHA) was invited by the U.S. Housing and Urban Development (HUD) to participate in a Moving to Work (MTW) demonstration. This demonstration allows the RCPHA to apply waivers to certain HUD regulations to encourage Section 8 tenants and clients to become more self-sufficient. To assist in this effort, the RCPHA will adopt seven waivers as allowed by HUD. The waiver descriptions, limitations to the proposed policy changes, and the proposed RCPHA policy associated with each waiver is described below. These waivers will be implemented to accomplish the RCPHA's goals for the MTW program.

MOVING TO WORK PROGRAM GOALS

The five goals of the Ripley County Public Housing Agency's MTW Program are:

- 1) Increasing the cost effectiveness of assisted housing programs. This will be accomplished by streamlining administrative procedures with the intent of reducing the number of staff hours needed and reducing the burden on assisted households.
- 2) Increasing the quantity and quality of affordable housing in the RCPHA service area. This goal will be met through the leveraging of additional housing funds and increasing the turnover of assistance slots.
- 3) Increasing the economic self-sufficiency of assisted households. Guidelines that promote rent reforms and requirements for receiving supportive services that encourage work among households with eligible work-abled adults will be implemented.
- 4) Promoting residential stability for targeted households with specific needs that may be underserved or not well served by the traditional public housing and HCV programs.

- 5) Expanding the geographical choices of assisted households through adjustments to payment standards and other program rules and through recruiting and maintaining the participation in the HCV program of a broader range of landlords.

PROPOSED WAIVERS AND ASSOCIATED POLICIES

A. Fixed Subsidy

MTW Waiver: The agency may establish a fixed subsidy based on bedroom size. Under this model, the family pays the difference between the gross rent for the unit and the fixed subsidy as the family share/tenant rent.

Limitations: For the HCV portion of this activity, the fixed subsidy must not result in a family paying more than 30% of income under the HUD rent calculation as defined by the 1937 Act.

Proposed Policy: This policy completely detaches rent from income and, therefore, removes entirely the “tax” on increased earnings created by the standard, 30-percent-of-income approach to calculating rent. The flat subsidy amount for clients of the RCPHA shall be 30% of the payment standard so long as this does not result in a family paying more than 30% of qualifying income.

B. Utility Reimbursements

MTW Waiver: The agency may eliminate utility reimbursement payments in the HCV program when the utility payment is more than the utility allowance.

Proposed Policy: Utility allowances established by the annual Utility Allowance Schedule shall be the maximum amount of utility payments that will be paid by the RCPHA. Any amounts in excess of the Utility Allowance Schedule shall be the responsibility of the tenant, with the exception of those tenants who are elderly or disabled.

C. Payment Standards – Fair Market Rents

MTW Waiver: The agency is authorized to adopt and implement any reasonable policy to establish payment standards based upon Fair Market Rents (FMR).

Limitations: 1) Payment standard must be between 80% and 120% of the FMR, 2) Agency must implement an impact analysis, and 3) Agency must implement a hardship policy.

Proposed Policy: The payment standard for an efficiency and one-bedroom unit shall be 110% of FMR. Units of 2 bedrooms and above shall remain 100%. This policy is to assist in expanding the geographical choice of assisted households and promote residential stability for single individual households.

D. Short-Term Assistance

MTW Waiver: The agency may create a short-term housing assistance program with supportive services in its HCV program.

Limitations: 1) The term of assistance must not be shorter than 3 months, 2) The term of assistance must not be longer than 36 months, 3) The short-term housing assistance program must include supportive services in one or more buildings (which may be in collaboration with local community-based organization and government agencies), 4) Subject to availability, successful participants of the short-term housing assistance program must be given the option of transferring into whichever program (section 8 or 9) the short-term housing assistance program falls under, 5) Under no circumstances will participants be required to participate in supportive services that are targeted to persons with disabilities in general, or persons with any specific disability, 6) The agency must not require participation in supportive services as a condition for housing subsidy for elderly and disabled families, 7) If the agency requires participation in supportive services as a condition for housing subsidy, an impact analysis must be developed and adopted in accordance with MTW guidance prior to the implementation of the activity, 8) If

the agency requires participation in supportive services as a condition for housing subsidy, a hardship policy must be developed and adopted in accordance with MTW guidance prior to the implementation of the activity, 9) The activity cannot be extended to an entire public housing or HCV program and must only serve specific populations.

Proposed Policy: The RCPHA will set aside 10 vouchers to be used for emergency, short-term assistance, including any utility and rental deposits if such deposit funds are not available from other sources. The term of this assistance shall not exceed 12 months. At that point, the tenant must meet a self-sufficiency standard that will enable the tenant to move onto the regular voucher program for the remaining time of the established term of assistance (up to 5 total years of assistance, including the emergency, short-term assistance), or graduate from the program entirely. Short-term assistance tenants are required to participate in supportive services offered by partners of the RCPHA based upon the tenant's current needs and established by the tenant's Housing Coordinator at the time of enrollment in the HCV program, with the above limitations taken into consideration.

A client will qualify for the emergency, short-term assistance if they are certified by the South Central Missouri Community Action Agency, Great Circle, the Poplar Bluff Housing Authority, the Haven House, the Family Counseling Center, Catholic Charities, Southeast Missouri Behavioral Health, or any other local support agency as homeless. While the RCPHA will not require persons with disabilities or the elderly to participate in specific supportive services, tenants must have an established relationship with one of these agencies, or similar agency, to document homelessness.

E. Term-Limited Assistance

MTW Waiver: The agency may limit the duration for which a family receives housing assistance.

Limitations: 1) The term of assistance may not be shorter than 4 years, 2) Services, or referrals to services, must be provided by the agency or a partner organization to support preparing families for the termination of assistance, 3) Agency must conduct an annual impact analysis, 4) Agency must exclude elderly and disabled families from term limit, 5) Agency must implement a hardship policy.

Proposed Policy: The term limit for housing choice voucher assistance from the Ripley County Public Housing Agency shall be 5 years. After a qualifying household has received assistance for that term, they will be ineligible from receiving future assistance unless they qualify for future assistance under the hardship policy. The RCPHA will make a substantial commitment to referring affected households to employment-supporting services. The Department of Elementary and Secondary Education's Vocational Rehab services and the Missouri Jobs Centers managed locally by the South Central Missouri Community Action Agency, will provide primary employment support. Participation in the services will be mandated for those affected households. MTW funding flexibility will help the RCPHA pay for this service.

F. Alternative Family Selection Procedures

MTW Waiver: The agency is authorized to develop its own recruitment and selection procedures for its MTW FSS Program. Alternatively, the agency may make participation in the MTW FSS Program mandatory for any household member that is non-elderly or non-disabled.

Proposed Policy: The RCPHA will require all non-elderly and non-disabled households to participate in the Family Self-Sufficiency program. If a slot is not available in the FSS program,

the household will be placed on a waiting list and must participate when a slot becomes available.

G. Work Requirement

MTW Waiver: The agency may implement a work requirement for HCV residents who are at least 18 years old. Additionally, residents must be non-elderly and non-disabled.

Limitations: 1) If the work requirement policy applies to all eligible individuals—the maximum requirement would be 15 hours of work per week per individual, 2) If the local work requirement policy applies to all eligible households, the maximum requirement would be 30 hours of work per week per household, 3) Prior to implementation, all residents shall be given notice six months in advance of the sanction policy for non-compliance, 4) The work requirement may apply to non-elderly, non-disabled households or non-elderly, non-disabled adult household members, 5) Those individuals exempt from the Community Service Requirement in accordance with Section 12(c)(2)(A), (B), (D) and (E) of the 1937 Act must be exempt from the agency's work requirement, 6) Individuals who are the primary caretaker for a child under 6 years of age or who are pregnant must also be exempt from the agency's work requirement, 7) Supportive services shall be provided, either through the agency or a partner organization, to assist families in obtaining employment or an acceptable substitute, as defined by the MTW agency's policy, 8) Work requirements shall not be applied to exclude, or have the effect of excluding, the admission of or participation by persons with disabilities or elderly individuals, or families that include persons with disabilities or elderly individuals, 9) Agency must conduct an annual impact analysis, 10) Agency must implement a hardship policy, including a policy to address tenants seeking a determination of disability status, 11) The hardship policy in the ACOP and/or Administrative Plan must apply to families who are actively trying to comply with the agency's

work requirement, but are having difficulties obtaining work or an acceptable substitute, 12) The ACOP and/or Administrative Plan must also describe the consequences of failure to comply with the work requirement.

Proposed Policy: The RCPHA will require non-elderly and non-disabled persons to adhere to a work requirement policy. Each eligible individual living in the household will be required to obtain a minimum of 15 hours of work or school per week, documented by submission of payroll check stubs or semester grade sheet from a secondary education institution submitted during the quarterly review process with FSS. Each individual will have access to support services from area employment support agencies, such as the Department of Elementary and Secondary Education's Vocational Rehab services and the Missouri Jobs Centers managed locally by the South Central Missouri Community Action Agency. Failure to comply with the work requirement will result in the termination of the client's housing choice voucher.