



Great Plains Housing Authority

MTW Plan and Application Package Table of Contents

All MTW Plan and application packages for the MTW Flexibility II Cohort of the MTW Expansion must be submitted with a table of contents arranged in the following order:

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Vision for PHA's Local MTW Program

The Great Plains Housing Authority is pleased to submit this application for the MTW Demonstration Program. We believe that our participation in MTW will help us further our mission. As described below, the Great Plains Housing Authority's overall vision for its Moving to Work (MTW) program focuses on the three statutory objectives of the MTW Demonstration Program:

- Reduce costs and achieve greater cost-effectiveness in federal expenditures.
- Give incentives to families with children where the head of household is working, seeking work, or preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
- Increase housing choices for low-income families.

We have a vision where GPHA can maximize the number of households served through the voucher program and making changes to the voucher program to make it more efficient to operate, more likely to increase the self-sufficiency of its participants, and more likely to attract and retain landlords and housing providers. GPHA has a vision to create locally designed programs which address the challenges we see in the six counties we serve in North Dakota. Our vision focuses on the three MTW statutory objectives: cost effectiveness, self-sufficiency and housing choice.

Housing policies and investments are often targeted to large populations and leave rural areas without the ability to respond to local needs. GPHA's Moving to Work application looks at improving client benefits to help meet their needs, improving service access and solutions, creating administrative relief, and providing better lives for those qualifying households. Although one of the purposes of Moving to Work (MTW) is providing administrative relief, GPHA's approach is geared toward a collaborative approach with client focus first and then administrative relief. MTW changes and flexibility will enable the Great Plains Housing Authority to further its partnerships with other agencies and state governments to provide stable and affordable housing opportunities and solutions to existing barriers.

GPHA seeks to reduce the administrative and regulatory burden for GPHA staff, clients and landlords/housing providers we serve; to increase housing choice options and to increase service providers' participation with our agency. Through the MTW demonstration program, GPHA wants to be able to be more effective with clients that we serve, by reducing their financial burdens, further coordinate services or help them to coordinate services so that GPHA can be more aligned with their needs for housing purposes.

Through a combination of MTW waivers and activities under HUD's MTW Operations Notice we have selected safe harbor waivers and developed agency-specific waivers. As a result, GPHA will be able to implement a more comprehensive approach to administering our voucher program. GPHA will also seek opportunities to apply for additional vouchers in the future, so that we can assist additional eligible households.

Self-Sufficiency: Our vision is that self-sufficiency would increase amongst our program participants. We want to establish policies and provide resources and services that enable stability and motivate personal growth. We believe that through a combination of policy changes and partnering with other Health and Human Service agencies and benefit programs, GPHA will be able to make changes that will encourage and increase self-sufficiency.

GPHA would revise the initial term residency requirement for families that move to the jurisdiction to gain a voucher before allowing portability requests. This change would change the requirement from a one-year

residency to two years. GPHA's intent with requiring voucher holders a two-year residency requirement, is to increase their opportunities for self-sufficiency. The three-year running attrition rate is 30% plus over 300 port-out and move requests. Frequent moves are interrupting and disrupting education for children in the household. For households with language barriers, we have language assistance tools within the community as well as job training tools, cooking and nutrition classes, and other services that can help voucher-assisted households become much more self-sufficient. By helping voucher-assisted households with at least two years of connections to service providers and their services, it will help increase stability in their lives. This activity would also help achieve greater cost-effectiveness from lowering the attrition rate by not having as many frequent annual portability requests and landlord leasing issues.

Flexibilities may allow better access to affordable housing and client solutions to barriers such as 1915(i) and other services. Two-year residency requirements prior to requesting portability may improve opportunities for client access to discounted internet access, school services, job training, transportation, and medical services and programs.

Great Plains Housing Authority would like the ability to utilize HAP funds to develop housing that meets community needs, to assist newly admitted extremely low-income households with security deposits to help them secure decent, safe, sanitary and affordable housing with the option of coordinating or collaborating with different services to become self-sufficient.

Cost Effectiveness: GPHA believes that there is already a wealth of ideas related to cost effectiveness used by current MTW agencies. However, we also want to see if there are other changes that would make sense for us, based on our unique geographical, housing market, and participant needs and challenges.

GPHA looks forward to implementing changes in the voucher program that will reduce the cost to administer the program, by eliminating or simplifying regulations and processes that present existing barriers to participants, landlords/housing providers, and program administrative staff.

For elderly or disabled households on fixed-incomes and without dependents, GPHA would eliminate the medical deduction and replace it with a standard deduction of 15 percent of their gross income. GPHA would also provide permissive deductions for paid child support and/or paid spousal support, paid renter's insurance. For clients who are elderly or disabled and on a fixed-income of Social Security, railroad, pension, veteran, or other fixed-income benefits, GPHA would retain the Cost-of-Living-Adjustment (COLA) amount for up to 24-months without capturing or calculating those amounts in their rent share. These activities will help households and provide greater cost efficiency to administering GPHA's voucher program.

GPHA would have biennial reexaminations for elderly/disabled households on fixed-incomes and without any dependents. This activity will provide greater cost efficiency to administering GPHA's voucher program.

GPHA would eliminate the selection process in the award of PBVs to properties owned and/or substantially controlled by the agency that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site. This activity will provide greater cost efficiency to administering GPHA's voucher program. GPHA would establish an alternative competitive process in the award of PBVs that are owned by non-profit, for-profit housing entities, or by the agency that are not public housing. This activity will provide greater cost efficiency to administering GPHA's voucher program.

GPHA would eliminate the 25% PBV cap on projects. Rural housing developments have fewer number of units and the 25% PBV cap may make a project ineligible for funding of PBVs. The administrative burden in applying for waivers and documenting rural needs in a timely fashion is time-consuming and may cancel proposed projects.

GPHA may calculate households' childcare expenses as the maximum amount allowed for a twelve-month period. This activity will help achieve greater cost-effectiveness and reduce the burden of monthly adjustments.

GPHA would implement exception payment standards up to 120 percent of applicable FMRs for households that qualify and request a reasonable accommodation. This activity will help households secure increased housing choice and help achieve greater cost-effectiveness.

For non-elderly, non-disabled households, GPHA would implement a minimum income requirement equal to the standard SSI benefit amount, adjusted with each year after 90 days on the program. Non-elderly, non-disabled households reporting zero income or minimum income including those who quit a job or lose a job, would be required to provide GPHA with documentation of Social Security, TANF, unemployment or other benefit application or documentation from a caseworker or medical provider. GPHA may waive the requirement in a specific area if the unemployment rate in the area, reaches over 10 percent of the population or non-elderly, non-disabled clients can demonstrate an inability to gain employment. GPHA believes that coordination with education, employment preparation and employment service grant programs, provides meaningful opportunities for non-elderly / non-disabled households to meet the minimum income requirement being set by the agency. This activity would increase self-sufficiency achieve greater program cost opportunities.

There are a number of challenges serving low-income households in our communities, including a range of impacts on inflated costs on the rental housing markets and utilities. Through the MTW waivers and GPHA's activities, these new changes will encourage increased landlord participation and create more opportunities for housing and affordability and accessibility within our community.

The MTW demonstration program will help GPHA maximize our ability to lease as efficiently and effectively as possible and to achieve other voucher program goals. MTW flexibility will serve to enhance our existing practices. These flexibilities will allow GPHA to assist more households to become self-sufficient and, in so doing, we will be able to serve more unassisted households each year.

Housing Choice: In the area of housing choice, GPHA will explore changes that will increase landlord participation as well as policies that will allow the voucher participants more housing options, as well as remaining committed to serving as many households as the program funding will allow. We also view the range of interventions and activities in our proposal as an effective approach for eviction prevention, financial stability and housing stability.

GPHA has shown that in tight housing markets, low-income families have barriers to leasing because they lack the necessary funds for security deposits and/or application fees. GPHA proposes using Housing Assistance Payments (HAP) funds to pay for part or all the security deposit funds and application fee expenses for newly admitted qualified participants. These activities will help unassisted households secure their choice of qualified housing and encourage goals of self-sufficiency. Administrative relief will be derived from lowering the attrition rate and helping clients find suitable housing faster with fewer applications. Between July 1, 2020, and June 30, 2023, GPHA issued 3,075 vouchers to applications with an average success rate at 45% and saw 1,128 end of participations during that time. The current success rate stands at 36%.

For voucher-assisted households where the utility allowance for tenant-paid utilities exceeds 30 percent of their monthly adjusted income resulting in a utility allowance payment, GPHA would send the payment to the utility provider(s) to ensure that the allowance went towards paying their utilities and to help prevent some households from receiving eviction notices due to non-payment. This activity helps preserve households'

housing choice and helps achieve greater cost-effectiveness.

Provide a description of the experience and skills of the PHA personnel with primary responsibility for the administration of the local MTW program.

GPHA personnel with primary responsibility for the administration of the local MTW program are David Klein, Executive Director and Cassandra DuBray, Deputy Director.

David Klein, GPHA's Executive Director, would have primary oversight of the MTW program. Mr. Klein has been the Executive Director of GPHA for 13 years. Mr. Klein expanded coverage from two counties to six, to become the first North Dakota PHA to formally combine HUD contracts, change legal names, and change state century code regarding housing boards. Mr. Klein holds a Master of Science in Management from Minot State University and a bachelor's degree in business administration from Valley City State University.

Mr. Klein has an extensive innovative leadership background implementing worker's safety protocols, building maintenance, parking and other software systems, campus emergency management, business consulting, and running numerous businesses. David played a critical role in protecting campus populations and assets during several historical floods. The North Dakota University System contracted with him to develop emergency management and communication protocols and systems. Mr. Klein's background with 20 media companies and disability advocates leads the different communication and outreach approaches.

Cassandra DuBray, GPHA's Deputy Director for over eight years, oversees the administration of the Section 8 Housing Assistance Program. Ms. DuBray has proven experience in administrative management, scheduling, customer service, marketing, and finances. Ms. DuBray possesses a business acumen with a strong record in strategic planning, project management, and all related communication functions, identifying deficiencies and potential opportunities, developing innovative and cost-effective solutions, increasing revenues and improving customer service offerings. A decisive leader with a strong track record of performance in turnaround and high-paced organizations, who utilizes keen analysis, insights and team approach to drive organizational improvements and implementation of best practices.

Provide a statement of fair housing and other civil rights goals, strategies, and specific actions. This subsection parallels the fair housing statement in the PHA Plan template that corresponds to the type of PHA. The statement supports the PHA's civil rights certification in its efforts to comply with 24 CFR 5.151, 903.7(o), and 903.15.

Fair Housing

It is the policy of the Housing Authority to comply fully with all Federal, State, and local nondiscrimination laws; the Americans with Disabilities Act; and the U. S. Department of Housing and Urban Development regulations governing Fair Housing and Equal Opportunity.

No person shall, on the ground of race, color, sex, religion, national or ethnic origin, familial status, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under the Housing Authority housing programs.

To further its commitment to full compliance with applicable Civil Rights laws, the Housing Authority will provide Federal/State/local information to applicants for and participants in the Section 8 Housing Program regarding discrimination and any recourse available to them if they believe they may be victims of discrimination. Such information will be made available with the application, and all applicable Fair Housing Information and Discrimination Complaint Forms will be made available at the Housing Authority office. In addition, all written information and advertisements will contain the appropriate Equal Opportunity language

and logo.

The Housing Authority will assist any family that believes they have suffered illegal discrimination by providing those copies of the housing discrimination form. The Housing Authority will also assist them in completing the form, if requested, and will provide them with the address of the nearest HUD Office of Fair Housing and Equal Opportunity.

1.2 Reasonable Accommodation

Disabled individuals or households may need reasonable accommodations in order to take full advantage of the Housing Authority housing programs and related services. When such accommodations are granted, they do not confer special treatment or advantage for the person with a disability; rather, they make the program fully accessible to them in a way that would otherwise not be possible due to their disability. This policy clarifies how people can request reasonable accommodation and the guidelines the Housing Authority will follow in determining whether it is reasonable to provide the requested accommodation. Because disabilities are not always apparent, the Housing Authority will ensure that all applicants/participants are aware of the opportunity to request reasonable accommodation.

35-II.G. SITE SELECTION STANDARDS Compliance with PBV Goals, Civil Rights Requirements, and NSPIRE-V Site Standards [24 CFR 983.57(b)]

The PHA may not select a proposal for existing, newly constructed, or rehabilitated PBV housing on a site or enter into an agreement to enter into a HAP contract or HAP contract for units on the site, unless the PHA has determined that PBV assistance for housing at the selected site is consistent with the goal of deconcentrating poverty and expanding housing and economic opportunities. The standard for deconcentrating poverty and expanding housing and economic opportunities must be consistent with the PHA Plan under 24 CFR 903 and the PHA administrative plan. In addition, prior to selecting a proposal, the PHA must determine that the site is suitable from the standpoint of facilitating and furthering full compliance with the applicable Civil Rights Laws, regulations, and Executive Orders, and that the site meets the NSPIRE-V site and neighborhood standards at 24 CFR 982.401(l).

It is the PHA goal to select sites for PBV housing that provide for deconcentrating poverty and expanding housing and economic opportunities. In complying with this goal, the PHA will limit approval of sites for PBV housing in census tracts that have poverty concentrations of 20 percent or less.

However, the PHA will grant exceptions to the 20 percent standard where the PHA determines that the PBV assistance will complement other local redevelopment activities designed to deconcentrate poverty and expand housing and economic opportunities in census tracts with poverty concentrations greater than 20 percent, such as sites in:

- A census tract in which the proposed PBV development will be located in a HUD- designated Enterprise Zone, Economic Community, or Renewal Community.
- A census tract in which the proposed PBV development will be located is undergoing significant revitalization as a result of state, local, or federal dollars invested in the area; concentration of assisted units will be or has decreased as a result of public housing demolition.
- A census tract where new market rate units are being developed where such market rate units will positively impact the poverty rate in the area.
- A census tract where there has been an overall decline in the poverty rate within the past five years;
or
- A census tract where there are meaningful opportunities for educational and economic

advancement.

Plan for Future Community/Resident Engagement

Serving rural communities, GPHA's outreach is done through community branches. GPHA uses newspapers, and online media, as well as sending mass e-mails and mailings out to clients. GPHA has communicated with clients and the public using Google Translate and Language Link for language translation services. We acknowledge that some individuals have unique circumstances that we must accommodate. Directly and through our qualified partners, we will assist participants access guides, tools and information translated under HUD's Limited English Proficiency regulation, implement accommodations for people with disabilities. The housing authority implemented spaces on the application to ask if accommodations are required, and if so, what language. The housing authority has signage reminding participants and others that the housing authority offers language services for free. In addition, the housing authority has an accommodation reminder notice to remind clients if they want a reasonable accommodation to remind the office prior to the appointment. GPHA plans to continue to engage assisted households in its low-income and affordable housing programs, as well as the broader community and stakeholders, in the implementation and development of its local MTW program. GPHA will be creating a working taskforce comprised of tenants and others who will help us create the MTW plan. During our public hearing with tenants GPHA will ask participants if they or other participants that they may know are interested in serving on this committee.

PHA Operating and Inventory Information

GPHA oversees the Housing Choice Voucher program and Mainstream Voucher programs over Logan, Stutsman, Foster, and Wells Counties in North Dakota. The jurisdiction is rural with the largest community being Jamestown, ND at 16,000 people. GPHA has 734 HCV and 158 Mainstream vouchers.

Of GPHA's voucher-assisted households: 31 percent are elderly households, 45 percent are headed by disabled head or spouse with 29 percent of all household members with a disability, 24 percent have a female headed household with children, 85 percent are Caucasian, 10 percent are Black Non-Hispanic, 3 percent are Native American Non-Hispanic, 0 percent are Native Hawaiian/Other Pacific Islander Only, 0 percent are Asian or Pacific Islander Non-Hispanic, White, 1 percent are American Indian/Alaska Native Only, White, 1 percent are Black/African American Only, and 2 percent are Hispanic or Latino.

As a result of its participation in the MTW Demonstration Program, if allowable, GPHA would create a development fund to address issues with the existing housing stock and market availability. GPHA would create this plan using a portion of Housing Assistance Payment Reserves over several years to develop affordable housing in conjunction with the Project-Based Voucher program.

Rental housing markets in GPHA's service area are very tight, especially in bedroom sizes two bedrooms or greater. Our voucher success rate is currently 36% but has been as low as 20%. With a growth in economic development and decline in new housing developments, vacancy rates and voucher success rates are low. GPHA went through an administratively burdensome and time-consuming reasonable accommodation process for 17 households that led to our agency payment standard to be raised to 120 percent of the applicable FMR, but that process still puts such households at a competitive disadvantage in the rental market. In terms of other challenges, GPHA has worked with third-party language providers to help translate with several voucher-assisted households and advocacy agencies to provide reasonable accommodations.

Provide any specific examples of how the PHA has demonstrated innovation and creativity within its current program (including grants received, participation in other HUD programs, etc.)

GPHA was one of the first PHAs in North Dakota with a Mainstream voucher program. Initially, our granted award was 22 Mainstream vouchers that grew exponentially to 158 Mainstream vouchers because of

partnerships GPHA developed within the state. GPHA developed a Mainstream preference which enabled such households to utilize the immediate portability feature for family unification and support services available in their current place of residency.

In 2018, GPHA was the first PHA in North Dakota to regionalize its administration of the voucher program. GPHA expanded coverage from two counties to six, to become the first North Dakota PHA to formally combine HUD contracts, change legal names, and change state century code regarding housing board. GPHA worked with HUD's policies for the consolidation of previously three individual PHAs into GPHA while continuing to provide those rural areas a voice and designation by creating a rural local admission preference. As a result, communities smaller than Jamestown would get a higher waitlist point value. Rural applicants could reside be served by available vouchers without having to worry housing assistance loss to other areas. GPHA's innovative measures led to two other North Dakota housing authority consolidations with three more proposed. Other housing authority boards requested GPHA enter in administrative contracts after seeing leadership in action.

GPHA succeeded in a legislation change regarding the number of Board members to better meet the needs of our local communities. In terms of administration, having a GPHA as a regionalized agency has saved a lot of work by having one Voucher Management System (VMS), one PIC submission, one budget, and one board to be responsive to our communities. GPHA is the mode of one agency entity for all of these agencies across different counties and the state, with one application that works for multiple counties in multiple areas. In addition, GPHA administers voucher programs for PHAs operating as separate entities in Eddie County and Dickey Sergeant, which provides consistent knowledge and experienced staffing of the program and program changes for households and landlords. If awarded MTW designation, GPHA would like to explore in future years the possibility of utilizing HUD PIH Notice 2023-08 titled, "Process and Requirements for Agency Regionalization under the Moving to Work Demonstration Program."

GPHA unique approaches are geared toward a client-first approach. For example, when COVID hit and everybody had to go remote, GPHA changed its software which allowed the agency to create online program forms so that they could be done remotely or electronically, rather than clients having to come into the office. GPHA's on-line forms were tested with disability groups and advocates for accessibility with those households who may need a screen reader and various other accommodation. GPHA used an online system with secure uploads, so that clients upload their documents directly to the office. We provided multiple ways of communication, including implementing text messaging, e-mails for outreach and program administration in addition to phone calls and office hours.

GPHA implemented a debit card program where we worked with our bank to buy prepaid debit cards or bank cards. Tenants with utility allowance payments could choose to receive the monthly deposited amounts electronically on their cards that they could use to pay their utility bills and to help prevent some households from receiving eviction notices due to non-payment. Other clients used the cards by having their Social Security benefits directly deposited. GPHA also works with community agencies administering the LIHEAP program by providing them with tenant-paid utility information for client's LIHEAP applications.

GPHA provides training opportunities and educational opportunities. GPHA provides weekly trainings to landlords and service providers and PHA groups. GPHA hosted three different conferences featuring participation by agencies from multiple states, which brought in HUD, PHAs, Public Health, U.S. Census Bureau and other governmental entities, real estate professionals, landlords and others to make sure that people could get necessary and innovative education. Our agency also collaborated with other service organizations for a series of Navigation Resource Clinics to help connect households to other available services.

ND011 Great Plains Housing Authority (GPHA) oversees Housing Choice Voucher program and Mainstream Voucher programs over Logan, Stutsman, Foster, and Wells Counties in North Dakota. The jurisdiction is rural

with the largest community being Jamestown, ND at 16,000 people. GPHA's regional office oversees Section 8 Voucher programs in Dickey, Eddy, Sargent, Foster, Logan, Wells, and Stutsman Counties in North Dakota. GPHA has 734 HCV and 158 Mainstream vouchers. The agency focuses on being "client centered" and crafting policies with collaborating partners.

Great Plains Housing Authority has proven to be a pioneer in the state of North Dakota for policies and outreach. GPHA worked with state agencies to develop plans on helping qualified households receive Mainstream Vouchers statewide. This allowed those clients to reside closer to services and supportive families. GPHA works directly with the ND State Hospital (psychiatric hospital), ND Veterans Affairs / Hospital, and service organizations for developmentally disabled individuals to work with case-management and clients. ND Human Services partnered with GPHA to create a more universal release of information. GPHA supported ND Health and Human Services to develop the 1915(i) amendment to help people using Medicaid receive behavioral health and substance abuse coverage.

The housing authority participates in creating monthly education services for professionals, landlords, and others. In addition, GPHA uses various methods to outreach to clientele who would not have access to normal media.

GPHA fully demonstrated and implemented the NSPIRE-Voucher program and provided continuous training to the ND Congressional Team, other housing authorities, and HUD personnel.

GPHA is applying to become a Moving to Work (MTW) agency to help demonstrate policy adaptations that allow our agency to become more efficient and client centered.

Plan for Local MTW Program

As described below in detail, the GPHA's overall vision for its Moving to Work (MTW) demonstration program focuses on the three statutory objectives of the MTW Demonstration Program – cost effectiveness, self-sufficiency and housing choice.

With significant modification as described further below, GPHA is interested in implementing the following MTW waivers and associated activities in the form of an Agency-Specific Waiver.

- Tenant Rent Policies – 1(u) : Standard Deductions (HCV)

Income deductions would be allowed for anyone that is permanently disabled or elderly (62 years of age and older). GPHA would use 15 percent of the gross income from a qualifying household member's income. If the household includes more than one (1) person with income: 1) additional person is non-qualifying, that person's income is fully counted; 2) additional person is qualifying, that person's income would follow the 15 percent rule.

Great Plains Housing Authority has many clients that use the medical expense deduction. Medical deductions may change each year, leaving many fixed income households seeing large spikes and drops in their rent portion. Although changes are happening under HOTMA, the IRS tax code and other program changes have left clients holding medical receipts only for housing purposes. Numerous housing clients exceed 200 pages in medical documentation each year. This is an enormous burden to review and document which items received payment and are eligible under IRS deductions. Housing Authorities must track medical information and store it under HIPAA compliance and documentation required for Federal Auditing standards.

Utilizing this amendment, GPHA would no longer need to review and maintain medical documents. This is an enormous time savings in reviews and for clients. GPHA would not need to explain calculations and decisions on specific bills to auditors. GPHA would not need to verify paid expenses with various medical providers. Clients would not need to maintain documentation just for housing assistance. GPHA currently has 698 local

client (not counting 55 portability), and there are 364 households that are either disabled or elderly. This helps amendment would help 52% of GPHA's client's budget without concern of large increases or decreases.

Permissive Deductions

HUD provides PHAs with the ability to create permissive deductions. GPHA would adopt these permissive deductions:

- Paid child support and/or paid spousal support. Households must provide statements and documentation showing continued payments to child support and/or spousal support to receive the deduction.
- Paid renter's insurance. Households must provide policy statements and documentation showing renter's insurance premium for the occupied unit.
- GPHA would allow clients who are elderly or disabled and on a fixed-income of Social Security, railroad, pension, veteran, or other fixed-income benefits, to retain the Cost-of-Living-Adjustment (COLA) amount for up to 24-months without capturing or calculating those amounts in their rent share. GPHA would not adjust for COLA until the biennial review. If GPHA approves a landlord's request for an annual rent increase as being rent reasonable, GPHA would use the stated income. If the household decides to move or port-out during the 24-month period, GPHA would need income documentation.

Clients must stay current on income reporting to receive permissive deduction(s). Clients that fail to report changes are subject to repayment.

Security Deposit and Application Fee Expenses

Great Plains Housing Authority previously used HOME Funds and COVID related allocations to assist clients with security deposits. Although GPHA can provide vouchers for rent, and some places are available, the client often doesn't have the funds for deposit. This is an enormous barrier to helping a client receive safe, decent, and suitable housing. GPHA proposes using Housing Assistance Payments funds to pay for part or all the security deposit funds for qualified households.

Deposit funds would be available to clients that are 1) At or below 30% Median Family Income, and 2) Do not have savings, checking, or electronic accounts more than \$5,000 combined. The security deposit would not exceed the monthly rent and GPHA can set a lower award ceiling.

Utility Allowance Payment Made Directly to Utility Providers on Behalf of Households

For voucher-assisted households where the utility allowance for tenant-paid utilities exceeds 30 percent of their monthly adjusted income resulting in a utility allowance payment, GPHA would send the payment directly to the utility provider(s) to ensure that the allowance went towards paying their utilities and to help prevent some households from receiving eviction notices due to non-payment. Due to language barriers comprehension difficulties, some households may not know that they need to put tenant-paid utilities in their name. If, however, GPHA could make utility allowance payments directly to utility companies on behalf of such households, this would assist them with this process.

Annualizing Childcare Expense Deductions

Households may pay childcare for nine months of the year but continue to make payments year-round as a way to hold their childcare position. Childcare expenses may increase or decrease during nine months of the year versus the remaining three months. Even when a family has Childcare Assistance Payments and only pays a family co-pay or share, when their income changes their family responsibility changes. To assist in a meaningful way, GPHA may calculate households' childcare expenses as the maximum amount allowed for a

twelve-month period. North Dakota's Health and Human Services Department publishes the average household expenditure on childcare based on the number of children and by household income category. One option would be to use that information to develop an annualized childcare expense for voucher-assisted households.

Exception Payment Standards

With significant modification as described further below, GPHA is interested in implementing the following MTW waivers and associated activities in the form of an Agency-Specific Waiver.

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

GPHA would implement exception payment standard for those that qualify and request a reasonable accommodation. Clients would need to complete a reasonable accommodation request and review with GPHA staff.

This procedure would maintain GPHA's basic range payment standards between 90 percent to 110 percent of applicable FMRs. GPHA does not want to set the market, but rather assist clients in finding suitable housing without leaving the community.

GPHA applied for 120 percent exception payment standards of applicable FMRs in the past, which required a lot of administrative time and expense. Setting the payment standard at 120% dramatically increased local rents as landlords set their rates by the payment standard meant to help a few.

HUD's exception payment standard procedure to go above 110 percent and higher of applicable FMRs for each client, is very time consuming and requires the tenant to submit extra personal documentation. This process limits new admission clients as the time needed for HUD HQ decisions is lengthy.

However, applying for and receiving HUD authority under the MTW demonstration program for GPHA to set exception payment standards above 110 percent of applicable FMRs for households needing a reasonable accommodation, would enable GPHA to make this determination in a timely fashion. GPHA would not need to adjust any software programming and maintain the standard deduction per HUD guidance.

Portability

GPHA would revise the initial term for families that move to the jurisdiction to gain a voucher before a voucher-assisted household could port-out of its service area to two-years. GPHA would have a clear and uniform policy in place to address how move requests are received and processed for PBV households. Participants would still retain the ability to request a tenant-based voucher for reasonable accommodation according to existing rules. GPHA administrators would also retain the ability to allow early portability under Mainstream Vouchers, case management, and other rules outlined in the Administrative Plan.

GPHA's proposed policy would facilitate families gaining assistance through job training, food stamps, Medicaid and other services that may take months to apply for in another location in addition, North Dakota law requires residents to change their driver's license or identification after 90 days residing in the state. Having an extended residency requirement will help children in the education by stabilization in one area and providing school resources to assist children if needed. Our coverage area provides education resources including several Title I elementary schools, job training, and childcare resources for qualifying households.

GPHA's intent with requiring voucher holders to lease within our service area for two years before porting-out, is to increase their opportunities for self-sufficiency. Frequent moves are interrupting and disrupting education for children in the household. Job training tools, cooking and nutrition classes, and other services that can help voucher-assisted households become much more self-sufficient. By helping voucher-assisted households with at least two years of connections to service providers and their services, it will help increase

stability in their lives.

Children would receive full attendance at schools rather than be displaced during different time periods. This helps the children develop their mindset and educational skills.

In addition, this would help landlords be more comfortable in leasing to non-local residents , reduce on client turnover, utility changes, and reduce deposit assistance.

Children would receive full attendance at schools rather than be displaced during different time periods. This helps the children develop their mindset and educational skills.

This portability revision would also help clients develop a community, provide access to daycares, and other amenities to help stabilize them.

The administrative relief comes from lowering the attrition rate by not having as many portability requests and landlord leasing issues. In addition, the housing authority, schools, and other agencies can assist in developing tools to help clients and their communities.

Additional administrative relief would be generated from not conducting as many annual meetings with clients and helping clients stay current with their finances. Additionally, this would help landlords track changes and reduce turnover.

Minimum Income Amount

For non-elderly, non-disabled households, GPHA would implement a minimum income requirement equal to the standard SSI benefit amount, adjusted with each year after 90 days on the program. For Non-elderly, non-disabled households stating zero income or minimum income including those who quit a job or lose a job, would be required to provide GPHA with documentation of Social Security, TANF, unemployment or other benefit application or documentation from a caseworker or medical provider. GPHA may waive the requirement in a specific area if the unemployment rate in the area, reaches over 10 percent of the population or non-elderly, non-disabled clients can demonstrate an inability to gain employment.

North Dakota has allocated funds to create workforce training centers and Jamestown, ND has one. These centers teach people minimum skills to help them in the workplace, including cooking skills, tax preparation, construction skills, and other programs that are being offered through our public school system, including education opportunities for adults. North Dakota's funding also includes paid programming to training programs such as becoming an LPN or CNA. This job service, which is underutilized, will pay for that education as long as someone qualifies under the requirements for those programs. GPHA believes that coordination with such services provide meaningful opportunities for non-elderly / non-disabled households to meet the minimum income amount.

GPHA would save on postage and time pertaining to its collection of documentation on how zero income clients cover bills or receive contributions. This would also help encourage lease-ups with landlords as clients would need to demonstrate income to support their living conditions and continued payments for tenant rental portion and utilities.

Proposed Use of MTW Funds

GPHA requests the authority to use Housing Assistance Payment funds and administrative fee funds flexibility using fungibility.

Evidence of Significant Partnerships

Great Plains Housing Authority developed extensive partnerships with North Dakota Health and Human Services (ND HHS) and the North Dakota State Hospital (NDSH) to create criminal background policies and waivers to assist clients transitioning from medical centers or corrections to their communities. GPHA partnered along ND HHS and Grand Forks Housing Authority to push North Dakota legislation to approve the Medicaid 1915(i) amendment to cover adult and children behavioral health services to those under Medicaid. Stutsman County Veterans Services and Freedom Resource Center worked closely with GPHA to roll out Mainstream Vouchers and identify vulnerable populations that may not have had case management. Great Plains Food Bank and ND Community Action also partner with GPHA to outreach and assist in deploying programs such as food trucks, weatherization, and low-income heating assistance.

Housing study and needs assessments were done with collaborations from North Dakota Housing & Finance Agency, South Central Dakota Regional County, various cities and counties, and the state of North Dakota. GPHA works closely with ND Department of Commerce and USDA Rural Development to guide other funding programs that impact rural areas.

GPHA has partnered with Money Follows the Persons, public health departments, ND Department of Environmental Quality, Stutsman County Extension Service, public schools, tourism, and others to provide unique opportunities for outreach and education. GPHA also participates in a regional homeless coalition, statewide Olmstead committee, and other groups.

GPHA contracted with North Dakota Health and Human Services to administer the Covid Emergency Rental Assistance program and Housing Facilitation programs over a large region. ND HHS relied on GPHA's expertise in working with landlords and tenants and expanded GPHA's coverage to statewide.

Commonwealth Development, MetroPlains, and Community Options are partners in Eagle Flats Apartments that brought mixed income development to downtown Jamestown and units designated for homeless or vulnerable populations.

These partnerships are deeply rooted in Great Plains Housing Authority in being "client centered." These agencies will have less paperwork and more flexibility in assisting clients and developing solutions unique to each community. GPHA views each client with a team approach stacked with partnerships.

Assessment of Past and Existing Efforts to Achieve Administrative Efficiencies

Great Plains Housing Authority has worked hard to create efficiencies where possible. The voucher application was streamlined to include criminal history policies, checklists, state compatible release of information, and bringing paperwork down to one signature. The office reformatting the annual re-examination to reduce signatures and mailing costs.

GPHA implemented required HAP direct deposit payments to reduce lost checks, costs, and payment delays from mail. This also allowed GPHA to have email statements to landlords prior to payments. GPHA created contracts to include all administered housing authority information to roll through GPHA when possible, reducing down on administrative burden and financial issues. The NSPIRE demonstration helped staff track inspection information, make uniform decisions, document fails, and contact the landlords with consistent information. GPHA issued bank cards and direct deposits to assist with timely utility payments.

GPHA utilizes numerous software packages to help track client information and process items in timely

fashion. Staff have standard letters and forms throughout the agency. GPHA uses electronic signatures on HAP contracts, re-examinations, and other paperwork to reduce our mailing costs and time.

The housing authority has an active accessible website that allows tenants, landlords, community members, and others to view any updated policy changes, meetings, public notices, and community services. One website feature clients and providers enjoy is the secure upload from the website directly to the office. Clients and providers can use their smartphone, tablet, or computer to securely upload information and get a receipt that the office processed the files.

Assessment of Needed Administrative Efficiencies

GPHA is interested in implementing the following MTW waivers and associated activities, if we are designated as an MTW PHA under this cohort:

- Reexaminations - 3(b): GPHA would have triennial reexaminations for elderly/disabled households on fixed-incomes and without any dependents.
- Project-Based Voucher Program Flexibilities - 9(c): GPHA would eliminate the selection process in the award of PBVs to properties owned by the agency that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site. A subsidy layering review must be conducted. GPHA must complete site selection requirements. HQS/NSPIRE inspections must be performed by an independent entity according to 24 CFR 983.59(b) or 24 CFR 983.103(f). GPHA is subject to Notice PIH 2013–27 where applicable, or successor. Property must be owned by a single-asset entity of the agency, see Notice PIH 2017–21.
- Project-Based Voucher Program Flexibilities - 9(d): GPHA would establish an alternative competitive process in the award of PBVs that are owned by non-profit, for-profit housing entities, or by the agency that are not public housing. If the selected project is PHA-owned, HQS inspections must be performed by an independent entity according to 24 CFR 983.59(b) or 24 CFR 983.103(f). GPHA is subject to Notice PIH 2013–27 where applicable, or successor.

Remove competitive bidding in rural areas to encourage development and solidify rental agreements with developers. Funding and rehab are difficult competitions for rural areas and having a PBV agreement to shore-up financial agreements is a plus. HUD requires a separate PBV competition round in which the housing authority creates a public notice requesting a PBV agreement within a community and holds a competitive round. This could create a conflict if another agency applies for the PBV. Financing through North Dakota Housing & Finance Agency (NDHFA) includes tax credit financing, HOME, ESG and other financing, or ND Commerce with Community Development Block Grants, already have state-wide competition. In addition, rural areas may require more PBV contracted units than allowed by HUD's regulation governing a 25 percent cap of PBV units as the development level. GPHA proposes to remove that cap as well.

GPHA believes in removing the additional public notice competition from other funding sources identified as having a standing competitive round. Removing those competitive rounds, public notices, and unit use limitations removes barriers that create an enormous burden and cost on administration. The current policies limit abilities for rural areas to reinvest in affordable housing.