



Great Plains Housing Authority

Serving Dickey, Eddy, Foster, Logan, Sargent, Stutsman, and Wells Counties

Public Notice

Great Plains Housing Authority

Proposed Annual Plan and Moving to Work Amendment

The public is invited to comment on the Great Plains Housing Authority's proposed Annual Plan and Moving to Work Amendment. The PHA Plan is a comprehensive guide to public housing agency policies, programs, operations, and strategies for meeting local housing needs and goals. There are two parts to GPHA's Plans – the Annual Plan and Moving to Work Amendment.

The public comment period is open March 7, 2025, and written comments on the proposed Annual Plan will be accepted through March 6, 2025. A copy of the draft plan may be viewed at Great Plains Housing Authority, or on our website, www.greatplainsha.com. Alternative formats or special accommodations are available for persons with disabilities upon request.

Great Plains Housing Authority will hold a public hearing on 10:00 AM on Friday, March 7, 2025, on the proposed 2026 Annual PHA Plan and MTW Supplement at Great Plains Housing Authority, 300 2nd Ave NE – Suite 200, Jamestown, ND. An option to join the meeting virtually will be available, with access information listed on our website: www.greatplainsha.com. Following the public hearing, the plan will be submitted to the GPHA board and HUD for review.

Requests for information and written comments should sent to:

Great Plains Housing Authority
300 2nd Ave NE – Suite 200
Jamestown, ND 58401

Comments may also emailed to: director@greatplainsha.com.

Zoom: <https://us06web.zoom.us/j/85195557692?pwd=bG7YtaG5gQAjZMM4kE1GPnfol0wHKs.1>

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Web: www.greatplainsha.com

Email: office@greatplainsha.com

Locations: Carrington, Ellendale, Jamestown, New Rockford





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Public Notice

Great Plains Housing Authority
Proposed Safe Harbor Waivers

The public is invited to comment on the Great Plains Housing Authority's proposed Moving to Work Safe Harbor Waivers. The MTW Safe Harbor Waivers are policy waivers and proposed program changes allowed under the Moving to Work designation.

The public comment period is open March 7, 2025, and written comments on the proposed Annual Plan will be accepted through March 6, 2025. A copy of the Safe Harbor Waivers may be viewed at Great Plains Housing Authority, or on our website, www.greatplainsha.com. Alternative formats or special accommodations are available for persons with disabilities upon request.

Great Plains Housing Authority will hold a public hearing on 1:00 PM on Friday, March 7, 2025, on the proposed 2026 MTW Safe Harbor Waivers at Great Plains Housing Authority, 300 2nd Ave NE – Suite 200, Jamestown, ND. An option to join the meeting virtually will be available, with access information listed on our website: www.greatplainsha.com. Following the public hearing, the plan will be submitted to the GPHA board and HUD for review.

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2026 ANNUAL PLAN AND MTW SUPPLEMENT

ND011
GREAT PLAINS HOUSING AUTHORITY
300 2nd Ave NE – Suite 200
Jamestown, ND 58401

MISSION STATEMENT:

Great Plains Housing Authority is a regional Moving-to-Work agency that creates safe, affordable, and accessible housing opportunities utilizing local, state, and federal housing programs for low- and moderate-income households. GPHA promotes economic self-sufficiency, housing stabilization, and community growth through local, state, and federal partnerships and collaborations.

ACCESS: The annual plan and/or five year plan are public documents and available on GPHA's website www.greatplainsha.com and at the main office: Great Plains Housing Authority, 300 2nd Ave NE – Suite 200, Jamestown, ND 58401.

The public can obtain a copy of the annual and/or five-year plan by requesting the document in-person, calling, emailing, or downloading the information from the website www.greatplainsha.com.

PUBLIC COMMENT: Each year the housing authority holds a public hearing and notifies the public through media, office postings, and www.greatplainsha.com regarding the annual and/or five year plan. The public can comment by attending the public hearing, submit an email comment, or mail information to the office. The board reviews comments before finalizing the plan.

PHA Annual and Five-Year Plan Definitions

Substantial Deviation

Any collective change in the planned or actual use of federal funds for activities that would modify the housing authority's mission of "... to provide safe, affordable housing opportunities for persons with low and moderate income and to promote economic self-sufficiency."

This definition does not include budget revisions, changes in organizational structure, changes resulting from HUD-imposed regulations, or minor policy changes.

Significant Amendment/Modification

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A Significant Amendment or Modification is defined as adding or removing a program that deviates from the housing authority's mission statement. Program additions are exempt from the definition as many program applications have separate public hearings, documentation, and board meetings.

This definition does not include budget revisions, changes in organizational structure, changes resulting from HUD-imposed regulations, or minor policy changes.

GOAL ONE: To increase the availability of decent, safe and affordable housing by maximizing participation in Housing Choice Voucher (HCV) Tenant Based Rental Assistance Program.

OBJECTIVES:

1. The GPHA staff will monitor the HAP payments monthly to ensure that either 100% of all anticipated Annual Contributions Contract is utilized or that 95% of total unit months are leased.
 - a. PHA will continue to "issue" vouchers in an effort to utilize a greater amount of budget authority while maintaining financial stability.
 - b. The housing authority developed waiting list preferences and required documentation for applicants claiming preferences. Applicants are assigned a preference at the time of application and can request a review of the preference if proper documentation is provided.
 - c. GPHA HCV Waiting List
 - i. Victims of Domestic Violence
 1. Documentation required: Victims must sign a confidentiality release and/or provide a letter from a domestic violence center stating the center worked with the applicant. (Depending on availability and financials, this does not guarantee immediate placement)
 - ii. Rural preference
 1. Applicants who apply from a rural community with the intent to live in a community will receive a boost in preference.
 - iii. Individuals or families residing within Dickey, Eddy, Foster, Logan, Sargent, Stutsman, and Wells Counties (processed in the following order)
 1. Elderly and disabled households
 2. Families with minor children
 3. Singles
 4. Applicants must provide documentation demonstrating a residence in identified counties. Documents must show a current address within the counties served (PO Box addresses not accepted). Acceptable documents

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- include pay stubs, utility bills, lease, cell phone or phone bills, or a notarized letter demonstrating established residence.
- iv. Non-residents of Dickey, Eddy, Foster, Logan, Sargent, Stutsman, and Wells Counties (processed in the following order)
 1. Residents within North Dakota
 2. Elderly and disabled households
 3. Families with minor children
 4. Singles
 - d. Mainstream Vouchers (Documentation required. Applicant must be disabled but not elderly, and a new client).
 - i. Applicant working with a state agency that has a current memorandum of understanding (MOU); and
 - ii. Live in institutional or segregated living; or
 - iii. Serious risk of institutional or segregated living; or
 - iv. At risk of homeless; or
 - v. Chronic homeless
 - e. Project based preferences and lists. PBV lists may have separate preferences and sorting.
 - f. The point system sorts local applicants based on their score, lowest number of points first, then sort by date and time of application.
 - g. The point system sorts local applicants based on their score, lowest number of points first, then sort by date and time of application.
 - h. In an effort to minimize any disparate impact caused by long-waiting lists, GPHA implemented a 5-to-1 ratio. GPHA will pull one-non-local applicant for every five local applicants pulled from the waiting list. If there isn't a non-local applicant, the housing authority can pull from the local list, but when a non-local applicant is available, the housing authority must pull them prior to a local applicant.
2. The GPHA has entered into cooperative portability arrangements with other PHAs in the state to utilize any excess funds. Although, GPHA will reduce portability arrangements, when possible, to support additional assistance locally.
 3. GPHA will provide rental assistance program throughout its jurisdiction by providing assistance to families at or below 50% of area median income while targeting 75% of all new admissions to families with exceptionally low incomes of less than 30% of median.
 - a. GPHA has established a tracking mechanism to select applicants to meet the 75% target.
 4. If invited by HUD, GPHA will submit an application to administer HCV provided to families living in developments affected by the "opt-out" by owners of the project-based voucher (PBV) program.

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5. Conduct a housing survey to use in the setting of the Payment Standards in the 90-110% range of the Fair Market Rents.
 - a. HUD issues new market rates in the 3rd quarter of each year. GPHA will review and if needed, adjust rates to ensure applicants can find affordable housing locally, and have the new rates available starting January 1. GPHA will also utilize services to maintain an accurate utility rate schedule.
6. Through efficient management of the program, the GPHA will maintain its Restricted Net Assets fund which will be used to increase housing opportunities.
7. Through various forms of print media, the GPHA will educate the participants, the landlords and the community on agency programs and guidelines.
8. Through constant monitoring, the GPHA will ensure effective management of the voucher program resulting in the Section Eight Management Assessment Program (SEMAP) rating of high performer.
9. GPHA will work with local, regional, and state agencies to provide transitional services for families relocating with special needs.

GOAL TWO: To provide technical assistance to other housing authorities, regional homeless coalition, other government agencies, non-profits, housing developers, and support agencies.,

OBJECTIVES:

- Staff members assist other PHAs by providing technical assistance at quarterly round tables, through phone inquiries and at local agencies.
- Participate in North Dakota housing authority collaborative meetings.
- Provide technical assistance to other small housing authorities in the region.
- Provide quality control services to other housing authorities.
- Attend state, regional and national conferences and share information with smaller PHAs with limited resources.
- Present training on Housing Choice Voucher and program regulations to any housing authority as requested.
- GPHA staff members assist other groups by providing technical assistance by attending meetings.
- Participate as presenter for area meetings and groups.
- Provided technical assistance to other small housing authorities and agencies in the region.
- Attend state, regional and national conferences and share information with other government agencies.
- Staff members will present training on voucher programs to any housing authority or entity as requested.

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- Continue participating in Olmstead Settlement meetings and providing updates on voucher utilization, regulations, and funding.

GOAL THREE: To increase communication with landlords, tenants, applicants.

OBJECTIVE:

- GPHA has a website greatplainsha.com and will use that website to post news, policy changes, meeting agendas, important documents, and other information. The housing authority will post any new developments on the website and via email, unless required by law to send them via mail. The website is a portal for all housing authorities working in collaborative agreements with Great Plains Housing Authority.
- GPHA will work with federal and state agencies to bring education opportunities to the region.
- GPHA will explore online training and videos when possible.
- Expanding text messaging capabilities with clients for reminders, documents, and other communication.
- Support online applications and certifications that allow clients to submit documents and signatures online.
- Support online forms to allow landlords to submit documentation through GPHA's website.
- Enforce ADA compliant rules with website and implement additional tools when possible.

GOAL FOUR: To explore partnerships in bringing affordable housing to the region and diversify the administrative portfolio.

OBJECTIVE:

- GPHA will work with developers in bringing affordable housing to the region. GPHA will provide technical assistance and support when necessary.
- GPHA will explore options to develop and own property that would be available to households that are in the low to moderate income levels.
- GPHA will apply for additional grants and voucher assistance when applicable.
- GPHA will explore partnerships to provide more opportunities for affordable homeownership.
- Through the ND Department of Commerce, North Dakota Housing and Finance, Community Action North Dakota, North Dakota Health and Human Services, GPHA will examine any programs that may help with housing rehab for elderly or disabled homeowners.
- The housing authority will explore other options and programs to extend services when funding is available, and the program does not create an administrative burden.

GOAL FIVE: To program technical and data assistance to other agencies and developers about the

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region, specific to clientele and region.

OBJECTIVE:

- GPHA complies housing data for HUD and reviews that information quarterly to meet rent needs, comparisons, and vacancies.
- GPHA will provide such data in a timely fashion if it does not interfere with or prohibit GPHA employees from accomplishing day-to-day operations.
- North Dakota Housing and Finance, Jamestown Stutsman Development Corporation, HUD, USDA Rural Development, South Central Dakota Regional Council, North Dakota Department of Commerce, and other government entities, and other developers require data that GPHA maintains regarding low-to-moderate income families and special populations that is useful for funding opportunities.

GOAL SIX: To implement and administrate project-based vouchers across the jurisdiction.

OBJECTIVE:

- GPHA can develop relationships with housing providers by project basing vouchers that create better opportunities for clients and communities.
- GPHA will pursue using up to the allowed maximum voucher under HUD project based guidelines.
- Project based vouchers are a tool to help develop new units and modify old units.
- GPHA will establish a separate Waiting List for each project-based voucher development and sorting based on complex funding, demographics, and community needs. Program participants may elect to apply for a specific development or multiple lists. GPHA will work with the property manager to help facilitate high occupancy and quality applications.

Great Plains Housing Authority will follow HUD protocol in using project-based vouchers as detailed in HUD guidance and the Administrative Plan.

- If developing new projects, GPHA will hold a competitive bidding process to attract and develop qualified housing with various resources.
- GPHA will determine if the PBV proposal complies with HUD program regulations and requirements and determine budget authority.
- GPHA may enter into project-based agreements if a developer is awarded funding through another competitive process such as Low Income Housing Tax Credit, HOME Funds, or the ND Housing Incentive Fund. The housing authority will need to analyze budget prior to any agreements and determine market needs.
- All project-based contracts require housing needs analysis and program impacts.

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GOAL SEVEN: To explore and implement strategies under Moving-to-Work (MTW) status that enhance participant experience, reduce administrative burden, expand partnerships, and explore developments.

- Explore and implement strategies to help support program participants in the path to self-sufficiency.
- Implement programs to aid program participants in self-sufficiency.
- Review program regulations and waivers that provide administrative relief and support operations continuity.
- Expand partnerships with service and community organizations.
- Explore joint powers agreements, voluntary transfers, and other MTW expansions with partnering housing authorities.
- Build capacity to assist communities in growing and diversifying housing offerings.
- Support office staff using HAP funds for administrative purposes

Great Plains Housing Authority will carry out all activities and items listed in this plan in compliance with all applicable civil rights requirements and that the Great Plains Housing Authority will affirmatively further fair housing.

VIOLENCE AGAINST WOMEN ACT (VAWA) GOALS.

Provide a statement of the PHA's goals, activities, objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.

GPHA collaborates with local domestic violence shelters to assist vulnerable clients. This includes providing applications and documentation for domestic violence shelters and assisting with application completion. GPHA works with shelters to provide waivers and alternate documentation needs.

HOW DOES THE PLAN MEET STATE CONSOLIDATED PLAN?

GPHA's plan is consistent with the State Consolidated Plan by assisting local clients with waiting list preferences, collaborating with other agencies, and exploring options to expand housing options.

AFFIRMATIVELY FURTHERING FAIR HOUSING (AFFH) GOALS

GOAL 1: AGENCY SUPPORTS

Great Plains Housing Authority supports High Plains Fair Housing Center across North Dakota and the

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region via event promotion, education, and flyers.

GPHA and Money Follows the Persons develops weekly trainings available to landlords, service providers, and others free. These trainings are available online and help client, landlords, providers, and community members understand rights, responsibilities, and reporting.

High Plains Fair Housing Center often requests GPHA to help with presenting information in various formats. In addition, GPHA assists High Plains Fair Housing on HUD policies, administrative plan questions, and contacts.

GOAL 2: EXPAND TENANT EDUCATION AND TOOLS.

GPHA includes fair housing information with initial briefing packets and annual recertification documents. High Plains Fair Housing Center and ND Department of Labor Human Rights Division contact information is on GPHA's website www.greatplainsha.com.

GPHA posts event information on their website and shares that information with tenant, landlords, community members and others via email and other messaging.

GPHA expanded communication capabilities with a text messaging service to help clients communicate better in their natural language, use accessibility services, and other tools to help clients understand the program and policies.

Publish policies, procedures, public notices and other information to greatplainsha.com. Website is ADA compliant and allows clients to translate information as necessary.

GOAL 3: GOVERNMENT AGENCY INFORMATION

GPHA assists with local and regional housing discussions. This includes being present at city meetings during National Fair Housing Month presentations, or community discussions on housing.

GPHA participates in numerous local, regional, and state committees on domestic violence, Olmstead settlement, regional homeless coalitions, and others to help education and enforce fair housing standards.

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MTW Supplement to the Annual PHA Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

OMB No. 2577-0226
Expires: 03/31/2024

Purpose. The Moving to Work (MTW) Supplement to the Annual PHA Plan informs HUD, families served by the PHA, and members of the public, about the MTW Waivers and associated activities that the MTW agency seeks to implement in the coming Fiscal Year and updates the status of MTW activities that have been previously approved. It also provides information about Safe Harbor Waivers, Agency-Specific Waivers, compliance with MTW statutory requirements, and evaluations. The MTW Supplement does not replace the PHA Plan. MTW agencies must continue to submit the applicable PHA Plan. MTW agencies that are not required to submit annual PHA Plans under the Housing and Economic Recovery Act of 2008 (HERA) must submit the MTW Supplement annually, in addition to holding public hearings, obtaining board approval, and consulting with Resident Advisory Boards (RABs) and tenant associations, as applicable, on planned MTW activities.

Applicability. Form HUD-50075-MTW is to be completed annually by all MTW agencies brought onto the MTW Demonstration Program pursuant to Section 239 of the Fiscal Year 2016 Appropriations Act, P.L. 114-113 (2016 MTW Expansion Statute) or legacy MTW agencies² that chose to follow the requirements of the MTW Operations Notice.

Definitions. All terms used in this MTW Supplement are consistent with the definitions stated in the MTW Operations Notice, including:

(1) **Local, Non-Traditional Activities (LNT)** – Those MTW activities that use MTW funding flexibility outside of the Housing Choice Voucher (HCV) and public housing programs established in Sections 8 and 9 of the U.S. Housing Act of 1937.

(2) **Safe Harbors** – The additional parameters or requirements, beyond those specified in the MTW activity description itself found in the MTW Operations Notice, following each activity description, that the MTW agency must follow in implementing MTW activities.

(3) **Substantially the Same Requirement** – A statutory MTW requirement that MTW agencies must continue to assist substantially the same total number of eligible low-income families as would have been served absent the MTW demonstration.

A.	PHA Information.
A.1	<p>PHA Name: Great Plains Housing Authority PHA Code: ND011 MTW Supplement for PHA Fiscal Year Beginning: 07/01/2024 PHA Program Type: Housing Choice Voucher (HCV) only MTW Cohort Number: 5 MTW Supplement Submission Type: Amended Annual Submission</p>
B.	Narrative.
B.1	<p>MTW Supplement Narrative. The narrative provides the MTW agency with an opportunity to explain to the public, including the families that it serves, its MTW plans for the fiscal year and its short and long-term goals.</p> <p>The MTW agency should provide a description of how it seeks to further the three MTW statutory objectives during the coming Fiscal Year. Those three MTW statutory objectives are: (1) to reduce cost and achieve greater cost effectiveness in federal expenditures; (2) to give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient, and (3) to increase housing choices for low-income families.</p>

B. Narrative

GPHA have a vision where they 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 MTW 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 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 GPHA to further its partnerships with other agencies and state governments to provide stable and affordable housing opportunities and solutions to existing barriers.

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 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 use the Cost-of-Living-Adjustment (COLA) amount for calculating income and the households' rent share in the biennial reexamination year. These activities will help provide greater cost efficiency to administering GPHA's voucher program.

For non-elderly, non-disabled households, GPHA would implement a minimum income requirement of 15 hours per week per adult or 30 hours per week for a household. 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 and achieve greater program cost opportunities. GPHA will work with community partners to help qualifying individuals apply for Supplemental Security Income (SSI).

There are several 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, and stabilize attrition rates.

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.

The following MTW activities will apply to GPHA's special purpose voucher program - Mainstream 5-year program.

- Activity: 12.b. Work Requirement (HCV & MS5)
- Activity: C. 17.c. Local, Non-Traditional Activities - Housing Development Programs (HCV & MS5)
- MTW Safe Harbor Waiver Request - Activity: 1.w. Alternative Income Inclusions/Exclusions (HCV & MS5)
- MTW Safe Harbor Waiver Request – Activity 1.s. Elimination of Deductions and Replacement (HCV & MS5)

C.	MTW Waivers and Associated Activities.
	NOTE: MTW agencies are reminded that all MTW Waivers and associated activities must be implemented in accordance with the MTW Operations Notice and within its safe harbors unless a Safe Harbor or Agency-Specific Waiver approval is provided by HUD, in which case, the activity utilizing the Safe Harbor or Agency-Specific Waiver must be implemented in accordance with the terms of the approval.
Screeners	<p>For all MTW Waivers and Activities in Section C, the screening question listed below will be presented in the fillable form. This will allow the form to only display those waivers that input where is required. Each waiver and activity will be listed with the following choices. If “Not Currently Implemented” is selected, the agency will not be shown any further questions for the activity.</p> <ul style="list-style-type: none"> • Currently Implementing • Plan to Implement in the Submission Year • Will be Discontinued in the Submission Year • Was Discontinued in a previous Submission Year • Not Currently Implemented

Core Questions	The following core questions apply to all of the MTW Waivers and associated activities listed in the MTW Operations Notice. The core questions collect basic information about any MTW activity proposed or implemented by MTW agencies.
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Text	Input options and instructions
Narrative. 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.	Text box [Note: If an MTW agency has the same MTW activity in both its public housing and HCV programs, it receives instructions to just write one narrative explaining that it covers both programs.]
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) <input type="checkbox"/> Cost effectiveness <input type="checkbox"/> Self-sufficiency <input type="checkbox"/> Housing choice
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.	(Check at least one) <input type="checkbox"/> Neutral (no cost implications) <input type="checkbox"/> Increased revenue <input type="checkbox"/> Decreased revenue <input type="checkbox"/> Increased expenditures <input type="checkbox"/> Decreased expenditures
Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?	<input type="checkbox"/> The MTW activity applies to all assisted households <input type="checkbox"/> The MTW activity applies only to a subset or subsets of assisted households <i>If the agency selects “The MTW activity applies only to a subset or subsets of assisted households” then the agency will receive the following three questions:</i>
Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?	(Check one) <input type="checkbox"/> New admissions (i.e., applicants) only <input type="checkbox"/> Currently assisted households only <input type="checkbox"/> New admissions and currently assisted households

Text	Input options and instructions
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<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	<p><input type="checkbox"/> The MTW activity applies to all family types</p> <p><input type="checkbox"/> The MTW activity applies only to selected family types</p> <p><i>If the agency selects “The MTW activity applies to all family types” it does not get any further questions about family types. If the agency selects “The MTW activity applies only to selected family types” it is presented the following question and options:</i></p> <p>Please select the family types subject to this MTW activity:</p> <p><input type="checkbox"/> Non-elderly, non-disabled families</p> <p><input type="checkbox"/> Elderly families</p> <p><input type="checkbox"/> Disabled families (to the extent those families are not exempt via a reasonable accommodation)</p> <p><input type="checkbox"/> Other – another specifically defined target population or populations. Please describe this target population in the text box. [Text box]</p>
<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For PH activities: Does the MTW activity apply to all public housing developments?</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For PH activities:</p> <p><input type="checkbox"/> The MTW activity applies to all developments</p> <p><input type="checkbox"/> The MTW activity applies to specific developments</p> <p><i>If the agency selects “The MTW activity applies to specific developments” then it is presented the follow up question:</i></p> <p>Which developments participate in the MTW activity? [agencies choose the applicable development number(s) from a list of their public housing developments]</p> <p>For HCV activities:</p> <p><input type="checkbox"/> The MTW activity applies to all tenant-based units</p> <p><input type="checkbox"/> The MTW activity applies to all properties with project-based vouchers</p> <p><input type="checkbox"/> The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers</p> <p><i>If the agency selects “The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers” then it is presented the follow up question:</i></p> <p>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity. [Text box]</p>

<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	<p>Yes/No [If Yes]: What is the status of the Safe Harbor Waiver request? _____ The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D). _____ The waiver was previously approved. [If checked]: Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity. [Text box]</p>
<p>Does this MTW activity require a hardship policy?</p>	<p>Yes/No/Already provided [If Yes]: Upload Hardship Policy [If No, skip below Hardship Policy questions] [If Already provided, the agency has already provided the Hardship Policy under another activity and indicated that the policy is also applicable to this activity.]</p>
<p>Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</p>	<p>Yes/No [If yes, a list will be presented to select the applicable MTW activities]</p>

Text	Input options and instructions
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?	Yes/No [If Yes, then a further question pops up.]: What considerations led the MTW agency to modify the hardship policy? [Text box]
How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?	<p>_____ [Numerical entry only] [if number > 0, further questions pop up]:</p> <p>_____ How many hardship requests were approved? [Numerical entry only]</p> <p>_____ How many hardship requests were denied? [Numerical entry only]</p> <p>_____ How many are pending? [numerical entry only]</p>
Does the MTW activity require an impact analysis?	Yes/No/Already provided [If Yes]: Upload Impact Analysis [If No, skip the below Impact Analysis questions] [If Already provided, the agency has already provided the impact analysis under another activity and indicated that the policy is also applicable to this activity.]
Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)	Yes/No [If yes, a list will be presented to select the applicable MTW activities]
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.	[Text box]
Please provide an explanation as to why the activity was discontinued or will be discontinued.	[Will only apply if "Will be Discontinued in the Submission Year" or "Was Discontinued in a previous Submission Year" is selected in the screener.] [Text box]

Custom Questions	Custom questions are tailored to each MTW activity. In what follows, the MTW activities are listed with their custom questions. The final online version of the MTW Supplement will be set up so that if an MTW activity is the same in the HCV and/or public housing programs, the MTW agency fills in the information for public housing, then the information is auto populated for the HCV program. MTW agencies are asked to fill in answers only to questions that are relevant to the MTW activities they propose to implement or are already implementing.
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C.1	Tenant Rent Policies
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1.a., 1.b. - Tiered Rent (PH & HCV)	Input options and instructions
Please describe how the income bands are structured.	[Text box]

Please upload the tiered rent policy table that shows the income bands.	[Upload document]
What is the income basis for assigning households to income bands?	<input type="checkbox"/> This activity uses adjusted annual income as defined in 24 CFR 5.611 (as required for non-MTW PHAs) <input type="checkbox"/> This activity uses a different definition of income because we are using the following MTW waivers (check all that apply) <input type="checkbox"/> 1.r. and/or 1.s. "elimination of deductions" <input type="checkbox"/> 1.t. and/or 1.u. "standard deductions" <input type="checkbox"/> 1.v. and/or 1.w "alternative inclusions and exclusions"

1.c., 1.d. - Stepped Rent (PH & HCV)	Input options and instructions
Describe how the stepped rent is structured, including the following: how each household's rent will be set in the first year; how frequently rents will change and by what amount; and how the stepped rent will end (i.e., what is the maximum rent). Please	Description [Text box] Stepped rent schedule [Upload document]

1.c., 1.d. - Stepped Rent (PH & HCV)	Input options and instructions
upload a document that presents the stepped rent schedule in the form of a table.	
If a household progresses all the way through the stepped rent schedule, what will their status be?	<input type="checkbox"/> They will no longer receive a subsidy <input type="checkbox"/> They will continue to receive a shallow subsidy <input type="checkbox"/> Other\Not Applicable. [If checked]: Please explain [Text box]

1.e., 1.f. - Minimum Rent (PH & HCV)	Input options and instructions
How much is the minimum rent or minimum Total Tenant Payment (TTP)?	\$ _____ [Note: If the MTW agency indicates they have a minimum rent that applies only to particular subgroups, as determined by responses to core questions, the question gets asked for each subgroup.]

1.g., 1.h. - Tenant Payment as a Modified Percentage of Income (PH & HCV)	Input options and instructions
What percentage of income will equal the Total Tenant Payment (TTP)?	_____ %
What is the income basis for calculating Total Tenant Payment?	<input type="checkbox"/> This activity uses adjusted annual income as defined in 24 CFR 5.611 (as required for non-MTW PHAs) <input type="checkbox"/> This activity uses a different definition of income because we are using the following MTW waivers (check all that apply) <input type="checkbox"/> 1.r. and/or 1.s. "elimination of deductions" <input type="checkbox"/> 1.t. and/or 1.u. "standard deductions" <input type="checkbox"/> 1.v. and/or 1.w. "alternative inclusions and exclusions"

1.i., 1.j. - Alternative Utility Allowance (PH & HCV)	Input options and instructions
Please describe the alternative method of calculating the utility allowances. Please explain how the method of calculating utility allowances is different from the standard method and what objective the MTW agency aims to achieve by using this alternative method.	[Text box]

1.k., 1.l. - Fixed Rents/Subsidy (PH & HCV)	Input options and instructions
Describe the method used to establish the fixed rents.	[Text box]
How many households are currently subject to this policy?	[Text box]

Table 1.k.1, 1.l.1 - What is the fixed rent/subsidy for each of the following unit sizes?

Unit Size	Rent Amount – PH	Subsidy Amount – HCV
Studio/Efficiency	\$	\$
One-bedroom	\$	\$
Two-bedroom	\$	\$
Three-bedroom	\$	\$
Four or more bedrooms	\$	\$

1.m., 1.n. - Utility Reimbursements (PH & HCV)	[No custom questions for this activity.]
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1.o. - Initial Rent Burden (HCV)	Input options and instructions
If the MTW agency plans to implement a new maximum income- based rent percentage (higher than 40% of adjusted monthly income), what is that maximum?	_____ %

1.p., 1.q. - Imputed Income (PH & HCV)	Input options and instructions
Does the imputed income policy assume a set number of hours worked per individual or per household?	(Check one) __ Per individual . Per household
How many hours per week are assumed?	[Number entries between 0 and 15 or 0 and 30, as appropriate, allowed]
What is the assumed wage rate?	[Must be a number less than or equal to the federal minimum wage]

1.p., 1.q. - Imputed Income (PH & HCV)	Input options and instructions
How many households are currently subject to this policy?	_____ [number]

1.r., 1.s. - Elimination of Deduction(s) (PH & HCV)	Input options and instructions
Which deduction(s) will be eliminated, modified, or added?	(Check all that apply) _____ Dependent allowance _____ Unreimbursed childcare costs <input checked="" type="checkbox"/> Other (please explain) – GPHA would replace the medical expense deductions and create a 15% income exclusion to qualifying households.

1.t., 1.u. - Standard Deductions (PH & HCV)	Input options and instructions
How much will the single standard deduction be in the Fiscal Year?	\$ _____

1.v., 1.w. - Alternative Income Inclusions/Exclusions (PH & HCV)	Input options and instructions
What inclusions or exclusions will be eliminated, modified, or added?	GPHA would create two new exclusions. <ol style="list-style-type: none"> 1) Exclude paid child support or paid spousal support. Family arrangements may be court ordered or informal agreements (notarized). Participant must provide payment proof. 2) Exclude paid renter’s insurance or landlord liability. This is required by many landlords and enforceable by ND law.

Activity: 12.b. Work Requirement (HCV)	
<p>Narrative. 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.</p>	<p><i>Description:</i> This activity applies to Housing Choice Voucher (HCV) and Mainstream Voucher (MS5) participants.</p> <p>This activity establishes an MTW work requirement which applies to all households with an abled bodied, non-elderly non-disabled adult in the household. The work requirement mandates that all able-bodied adults 18 years of age and older, work a minimum of 15 hours a week per individual or 30 hours per household. Full-time enrollment in a post-secondary education program or work training program satisfies the work requirement. An adult child in the household is also subject to the work requirement. Failure to meet the work requirement is a program violation and cause for termination.</p> <p>Following are the exemptions to the work requirement and MTW rent structure:</p> <ul style="list-style-type: none"> • Elderly/Disabled Status - All adult household members age 62 or over, or who have disability status that prevents employment. • Temporary Medical Exemption - verified medical condition of a household member lasting longer than three months that limits or that prevents work activities. Must be

certified to by a licensed physician or medical practitioner.

- Discretionary Exemption - households with only one adult who does not have elderly/disability status and who, due to limitations of employment experience, education or training, or other significant barriers, is unable to earn sufficient income to meet the MTW minimum rent requirement.

- Work Requirement Exemption Only - Households receiving TANF Cash Assistance with one adult member who has been determined "not mandatory for work." The household will receive assistance under the MTW rent structure, but the person will not be subject to the work requirement.

Exempt households may elect annually to participate in the MTW rent structure if they meet the work requirement through employment income.

Failure to meet the work requirement results in a lease violation. If not corrected, tenant rent goes to full market rate for the unit.

HUD's Safe Harbor waivers require:

- i. If the work requirement policy applies to all eligible individuals—the maximum requirement would be 15 hours of work per week per individual.
- ii. If the work requirement policy applies to all eligible households, the maximum requirement would be 30 hours of work per week per household.
- iii. Prior to implementation, all residents shall be given notice six months in advance of the sanction policy for non-compliance.
- vi. The work requirement may apply to non-elderly, non-disabled households or non-elderly, non-disabled adult household members.*
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 in both the public housing and HCV programs.*
- viii. 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.
- ix. 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.
- x. Work requirements shall not be applied to exclude, or have the effect of excluding, the admission into housing or participation in supportive services by persons with disabilities or elderly individuals, or families that include persons with disabilities or elderly individuals.*
- iv. Agency must conduct an annual impact analysis.*
- xi. Agency must implement a hardship policy, including a policy to address tenants seeking a determination of disability status.*
- xii. 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.*
- xiii. The ACOP and/or Administrative Plan must also describe the consequences of failure to comply with the work requirement.*

Agency goals for MTW Activity:

GPHA's goal for this activity/waiver is to increase the average

	earned income of households participating in the MTW work requirement, as well as increased work training and enrollment in post-secondary education programs. In doing so, the goal is to increase families' self-sufficiency, housing choice and the cost effectiveness of GPHA's program.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	Self-Sufficiency Housing Choice Cost Effectiveness
Cost implications. 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
Different policy by household status/family types/sites? 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.
Household Status. 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
Family Types. Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies only to selected family types. The MTW activity applies to all households with a non-elderly non-disabled adult in the household.
Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV. For HCV activities: Does the MTW activity apply to all HCV tenant- based units and properties with project-based vouchers?	For HCV activities: The MTW activity applies to all properties with project- based vouchers
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	Yes
Does the MTW activity require an impact analysis?	Yes
Custom Questions: Custom questions are tailored to each MTW activity.	
Does the work requirement MTW activity exempt any type of household or individual other than those required to be excluded through the MTW Operations Notice or those excluded as a reasonable accommodation?	Yes [If Yes]: Please describe the conditions for exemption. Program participants receiving SSI, SSDI, or other benefits would be exempt. GPHA has the ability to suspend the requirement if unemployment rises above 8% in a locality.
What counts as "work" under this the work requirement MTW activity?	Employment, self-employment, or other documented earned income. GPHA does not require employment be within the counties covered. GPHA will allow participants to work remotely or telecommute.
How will the MTW agency monitor compliance with the work requirement MTW activity?	GPHA would require program participants to report income during annual reviews and monitor using IVT and EIV. Landlords/owners would report if program participants are not paying rent or utility portions.
What supportive services are offered to support households to comply with the work requirement?	GPHA is actively working with Job Service North Dakota, Jamestown Public Schools, North Dakota Commerce, and other regional organizations to help program participants improve job skills, understand financial documents, locate employment and training opportunities, and use child care assistance where available. GPHA may use HAP funding to assist with education through specific programs and transportation needs for up to 60 days to help participants get trained as identified in the admin plan.
How does the agency address noncompliance with the work requirement policy?	Program participants would be given a warning with notification of hardship waivers. Second notice would be termination for program violation. Landlords may give program participants and housing authority notice if behind on rent or utilities.
How many households are currently subject to the policy?	GPHA's analysis shows 126 households would be subject to the policy.
How many households in the most recently completed PHA	None, this is a new MTW activity.

fiscal year were sanctioned for non-compliance with the work requirement?	
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				SSI Annual	11316
				Wage to meet the SSI limit 20 hours per week	10.88077
				Clients that would need to meet requirement	126
		Month	Annual		
	HAP Now	118,201	1,418,412		
	HAP WR	58,710	704,524		
	Savings	59,491	713,888		

Activity: C. 17.c. Local, Non-Traditional Activities - Housing Development Programs	
<p>Narrative. 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.</p>	<p><i>Description:</i> This activity applies to Housing Choice Voucher (HCV) and Mainstream Voucher (MS5) participants.</p> <p>Under this activity, GPHA may utilize MTW funding to acquire, renovate and/or build affordable housing units that meet HUD requirements for MTW "local, non-traditional housing" as defined in HUD PIH Notice 2011-45 or successor notices. GPHA may utilize this activity to provide gap financing (grants or loans) to affordable housing developments including, but not limited to, PBV developments, Low Income Housing Tax Credit developments and/or other eligible development activities, subject to approval by the GPHA's Board of Commissioners. GPHA may also use MTW funds as gap financing to support local nonprofits in the acquisition, rehabilitation, or development of small- to medium-sized properties in our service area. MTW funds likely would be provided in the form of a loan or recoverable grant. GPHA may also use MTW funds for gap financing and to support its other owned or substantially controlled developments to leverage third-party debt in the form of tax-exempt bond financing, LIHTC equity, and other local sources. GPHA may expend MTW funds including Housing Assistance Payments and/or HCV Administrative Fee reserves on such activities if it shall not expend more than 10% of its Housing Assistance Payments budget on local, non-traditional activities including this housing development activity.</p> <p>In implementing this activity, GPHA shall: 1) ensure that families assisted meet the HUD definition of "low-income"; 2) comply with PIH Notice 2011-45 as applicable; 3) comply with Section 30 of the US Housing Act of 1937; and 4) Competitively bid any MTW funding awarded through this activity to a third-party provider.</p> <p><i>Agency goals for MTW Activity:</i></p>

	This activity supports the goals to increase housing choices for low-income households and to leverage additional funds for affordable housing development.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	Housing choice
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.	Increased expenditures
Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?	This activity applies to Housing Choice Voucher (HCV) and Mainstream Voucher (MS5) participants.
Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?	Both new admissions and currently assisted households
Family Types. Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies to all family types, including non-elderly persons with disabilities under the Mainstream 5-year program.
Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV. For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?	For HCV activities: The MTW activity applies to all properties with project-based vouchers
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	No
Custom Questions: Custom questions are tailored to each MTW activity.	
Does the MTW activity apply to all LNT units/properties?	The MTW activity applies to specific units/properties
Describe which LNT units/properties participate in the MTW activity?	<p>GPHA may use MTW funds to support local nonprofits in the acquisition, rehabilitation, or development of small- to medium- sized properties in our service area. MTW funds likely would be provided in the form of a loan or recoverable grant. MMNA may also use MTW funds to support its other owned or substantially controlled developments to leverage third-party debt in the form of tax-exempt bond financing, LIHTC equity, and other local sources.</p> <p>The cost implications for this activity are limited to the amount of MTW funding used to cover the financing gap on a given project. While the amounts of potential loans or grants to a nonprofit are not identified yet, GPHA does not expect contributions for individual projects to exceed \$100,000. If the funds are structured as a loan to a LIHTC partnership, the funds will be returned over time in the form of loan payments (which likely will be longer- term maturity or deferred loans). In most cases, regardless of ownership, this funding will be in the form of a loan, resulting in no cost implications to GPHA.</p>

17.c. - Housing Development Programs

For each LNT housing development that the MTW agency will commit funds to or spend funds on in this Fiscal Year, in Table 17.c.1 below please add the name of the development to one column heading and then provide the requested information, including the MTW agency role (Acquisition, Rehabilitation, or New Construction), the type of MTW agency financing (Gap Financing, Tax Credit Partnership, Other), and the total number of affordable units in the development. If possible, please provide a breakdown of the number of affordable units by level of affordability.

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 - 60% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other

Housing Development Programs that the MTW Agency plans to spend funds on in the 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 - 60% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other

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 - 60% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other

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 - 60% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other

D.	Safe Harbor Waivers
D.1 Safe Harbor Waivers seeking HUD Approval:	Yes
Will the MTW agency submit a request for approval of a Safe Harbor Waiver this year?	
D.	Safe Harbor Waivers.
D.1	<p>Safe Harbor Waivers seeking HUD Approval:</p> <p>The MTW Operations Notice describes a simplified process for MTW agencies to implement MTW activities outside of the safe harbors described in Appendix I. For each Safe Harbor Waiver request, a document that includes the following information must be provided: (a) the name and number of the MTW Waiver and associated activity for which the MTW agency is seeking to expand the safe harbor, (b) the specific safe harbor and its implementing regulation, (c) the proposed MTW activity the MTW agency wishes to implement via this Safe Harbor Waiver, (d) a description of the local issue and</p>

why such an expansion is needed to implement the MTW activity, (e) an impact analysis, (f) a description of the hardship policy for the MTW activity, if applicable, and (g) 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 request for approval of a Safe Harbor Waiver this year?

Yes .

(a) the name and number of the MTW Waiver and associated activity for which the MTW agency is seeking to expand the safe harbor,

Activity: 1.w. Alternative Income Inclusions/Exclusions

(b) the specific safe harbor and its implementing regulation,

Alternative Income Inclusions/Exclusions (HCV)—Certain provisions of sections 3(a)(1), 3(b)(4)–(5), and 8(o)(2)(A)–(C) of the 1937 Act and 24 CFR 5.609, 5.611, and 982.516.

(c) the proposed MTW activity the MTW agency wishes to implement via this Safe Harbor Waiver,

Description:

This activity applies to Housing Choice Voucher (HCV) and Mainstream Voucher (MS5) participants.

GPHA proposes the following permissive income exclusions:

- 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. Child support or spousal support may be informal notarized agreements and/or court mandated agreements; and
- Paid renter's insurance. Households must provide policy statements and documentation showing renter's insurance premium for the occupied unit.

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

HUD' Safe Harbor in its MTW Operations Notice states that the following condition is required, "i. Agency must exempt elderly and disabled individuals from this rent determination policy." However, HUD's MTW Operations Notice also describes a simplified process for MTW agencies to implement MTW activities outside of the safe harbors described in Appendix I. GPHA is seeking this Safe Harbor waiver in order to include all household types to benefit from this waiver activity, including elderly and disabled individuals and families.

Agency goals for MTW Activity:

By allowing paid child support and/or paid spousal support as permissive exclusion from income, GPHA's goal with this activity is to provide proper incentives for voucher-assisted households to make such payments in a timely fashion on behalf of their children by also having those amounts excluded from their income so that they are not "taxed" on their income for monies that they have paid out for this purpose. This will help support the goal of self-sufficiency.

By allowing voucher-assisted households to deduct paid renter's insurance, which is required of them, from their income, it will help to align the voucher program with this requirement and support the goal of self-sufficiency and housing choice.

MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?

Self-Sufficiency, Housing Choice and Cost Effectiveness

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

Increased HAP expenditures

Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

All assisted households

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

Both new admissions and currently assisted households.

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

This activity applies to all family types, (e.g. families with children, elderly, disabled, elderly non-disabled, and non-elderly persons with disabilities under the Mainstream 5-year program.

For HCV activities:

This activity applies to all tenant-based units and properties with project-based vouchers and Mainstream Vouchers.

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

GPHA proposes the following permissive exclusions:

- 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; and
- Paid renter's insurance. Households must provide policy statements and documentation showing renter's insurance premium for the occupied unit.

(d) a description of the local issue and why such an expansion is needed to implement the MTW activity,

By allowing paid child support and/or paid spousal support as permissive exclusion from income, GPHA's goal with this activity is to provide proper incentives for voucher-assisted households to make such payments in a timely fashion on behalf of their children by also having those amounts excluded from their income so that they are not "taxed" on their income for monies that they have paid out for this purpose. This will help support the goal of self-sufficiency.

By allowing voucher-assisted households to deduct paid renter's insurance, which is required of them, from their income, it will help to align the voucher program with this requirement and support the goal of self-sufficiency and housing choice.

HUD' Safe Harbor in its MTW Operations Notice states that the following condition is required, "i. Agency must exempt elderly and disabled individuals from this rent determination policy." However, GPHA is seeking this Safe Harbor waiver in order to include all household types to benefit from this waiver activity, including elderly and disabled individuals and families.

(e) an impact analysis

Enclosed.

(f) a description of the hardship policy for the MTW activity, if applicable, and

No hardship policy is applicable for this MTW activity

(g) 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.

Safe Harbor Waivers seeking HUD Approval:

The MTW Operations Notice describes a simplified process for MTW agencies to implement MTW activities outside of the safe harbors described in Appendix I. For each Safe Harbor Waiver request, a document that includes the following information must be provided: (a) the name and number of the MTW Waiver and associated activity for which the MTW agency is seeking to expand the safe harbor, (b) the specific safe harbor and its implementing regulation, (c) the proposed MTW activity the MTW agency wishes to implement via this Safe Harbor Waiver, (d) a description of the local issue and why such an expansion is needed to implement the MTW activity, (e) an impact analysis, (f) a description of the hardship policy for the MTW activity, if applicable, and (g) 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 request for approval of a Safe Harbor Waiver this year? Yes .

(a) the name and number of the MTW Waiver and associated activity for which the MTW agency is seeking to expand the safe harbor,

1.s. Elimination of Deduction(s) and 1.w. Alternative Income Inclusions/Exclusions.

Elimination of Deduction(s) (HCV)—Certain provisions of sections 3(a)(1), 3(b)(4)–(5) and 8(o)(2)(A)–(C) of the 1937 Act and 24 CFR 5.611, and 982.516.

1.w. Alternative Income Inclusions/Exclusions (HCV)—The agency may establish alternative policies to include or exclude certain forms of participant income during the income review and rent calculation process.

Statutes and Regulations Waived. Alternative Income Inclusions/Exclusions (HCV)—Certain provisions of sections 3(a)(1), 3(b)(4)–(5), and 8(o)(2)(A)–(C) of the 1937 Act and 24 CFR 5.609, 5.611, and 982.516.

(b) the specific safe harbor and its implementing regulation,

Alternative Income Inclusions/Exclusions (HCV)—Certain provisions of sections 3(a)(1), 3(b)(4)–(5), and 8(o)(2)(A)–(C) of the 1937 Act and 24 CFR 5.609, 5.611, and 982.516.

(c) the proposed MTW activity the MTW agency wishes to implement via this Safe Harbor Waiver,

This activity applies to Housing Choice Voucher (HCV) and Mainstream Voucher (MS5) participants.

Description:

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.

If an eligible household with income has out-of-pocket expense deductions and supportive documentation such as medical insurance bills, ND HHS recipient expenses, Medicare deductions, tenant participation history, etc., GPHA will use the greater of deducting 15% of gross income for any household exceeding the medical expense deduction threshold instead of itemized medical deductions.

Households that do not have qualifying deductions would receive the standard elderly or disabled deduction under HUD regulations.

Using the above utilization of criteria would allow for significant reduction of negative impacts via housing assistance programs and other economic assistance programs such as SNAP, Medicaid, Low Income Heating Assistance, ND Rent Rebate, etc.

This activity would apply to both HCV and Mainstream participants.

GPHA 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, unless at the time of a hardship

request. 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.

Medical deduction flat percentage hardship

Participants can request a hardship under the MTW Medical Deduction implementation. Participants that experience a negative change or are required to pay more out of pocket during the implementation can request an extension to remain at the current Housing Assistance Payment levels until the next annual review.

The housing authority can provide documentation and refer the participant to economic assistance programs that might help in budgeting.

GPHA will include statements on letters explaining a hardship and how to apply. GPHA will create a standard form to assist participants in applying for a hardship.

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.

This waiver would benefit elderly and disabled families and individuals, including non-elderly persons with disabilities under the Mainstream 5- year program.

Agency goals for MTW Activity:

This waiver may improve cost effectiveness in our effort to reduce the administrative burden. Decrease administrative time and costs required

to request, obtain, and follow up on tenant submission of medical and disability expense-related documents, allowing staff to focus on elderly and disabled households' other needs and other agency priorities. Additionally, this waiver will decrease burdensome documentation for participants and applicants, lowering barriers to participation.

Requested Waiver and Explanation

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. The standard elderly/ disabled deduction would remain. Clients would receive the 15% gross income exclusion if the client has eligible expenses that exceed the deduction threshold.

GPHA 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.

This waiver would benefit elderly and disabled families and individuals including non-elderly persons with disabilities under the Mainstream 5- year program.

This waiver may improve cost effectiveness in our effort to reduce the administrative burden. Decrease administrative time and costs required to request, obtain, and follow up on tenant submission of medical and disability expense-related documents, allowing staff to focus on elderly and disabled households' other needs and other agency priorities. Additionally, this waiver will decrease burdensome documentation for participants and applicants, lowering barriers to participation.

(d) a description of the local issue and why such an expansion is needed to implement the MTW activity,

This waiver may improve cost effectiveness in our effort to reduce the administrative burden. Decrease administrative time and costs required to request, obtain, and follow up on tenant submission of medical and disability expense-related documents, allowing staff to focus on elderly and disabled households' other needs and other agency priorities. Additionally, this waiver will decrease burdensome documentation for participants and applicants, lowering barriers to participation.

GPHA 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, unless at the time of a hardship request. 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.

Under activity 1.s. Elimination of Deduction(s) and activity 1.w. Alternative Income Inclusions/Exclusions, an agency must exempt elderly and disabled families from rent policy.* 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.

In order to enable elderly and disabled households to benefit from this waiver activity, a safe harbor waiver is needed.

(e) an impact analysis,

Enclosed

(i) a description of the hardship policy for the MTW activity, if applicable,

Enclosed.

(j) 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.

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

F.	Public Housing Operating Subsidy Grant	
<p>F. 1 Please provide the public housing Operating Subsidy grant information in the table below for Operating Subsidy grants appropriated in each Federal Fiscal Year the PHA is designated an MTW PHA.</p>	<p>N/A</p>	

G.	MTW Statutory Requirements.	
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<p>75% Very Low Income – Local, Non-Traditional. 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</p>	<p>N/A</p>	
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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.	
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H.	Public Comments.
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Please provide copy of all comments received by the public, Resident Advisory Board, and tenant associations.
Please attach a narrative describing the MTW agency’s analysis of the comments and any decisions made based on these comments.
If applicable, was an additional public hearing held for an Agency-Specific Waiver and/or Safe Harbor waiver?	N/A

I.	Evaluations.
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Please list any ongoing and completed evaluations of the MTW agency’s MTW policies that the PHA is aware of, including the information requested in the table below. In the box “title and short description,” please write the title of the evaluation and a brief description of the focus of the evaluation.	N/A
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J.	MTW Certifications of Compliance.
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The MTW agency must execute the MTW Certifications of Compliance form and submit as part of the MTW Supplement submission to HUD.	Completed
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E.	Agency-Specific Waivers.
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E.1	<p>Agency-Specific Waivers for HUD Approval:</p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency’s description of how the comments were considered, as a required attachment to the MTW Supplement</p>
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Custom Questions: Custom questions are tailored to each MTW activity.	
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Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?	No
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E.2	Agency-Specific Waiver(s) for which HUD Approval has been Received: For each previously approved Agency-Specific Waiver(s), a set of questions will populate. Does the MTW agency have any approved Agency-Specific Waivers? Yes [If no, question set concludes]
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F.	Public Housing Operating Subsidy Grant Reporting.
F.1	Please provide the public housing Operating Subsidy grant information in the table below for Operating Subsidy grants appropriated in each Federal Fiscal Year the PHA is designated an MTW PHA.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
N/A	N/A	N/A	N/A	N/A

G.	MTW Statutory Requirements.
G.1	<p>75% Very Low Income – Local, Non-Traditional.</p> <p>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.</p>

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

*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.
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Question	Input options and instructions
Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?	<p>Yes [If Yes]: please describe the MTW agency’s plans for its future rent reform activity and the implementation timeline. Please see detailed explanations above for each of the following rent reforms, all to take commence implementation effective July 1, 2023.</p> <ul style="list-style-type: none"> Tenant Rent Policy – Activity: 1.o. Initial Rent Burden (HCV); and Activity: 1.u. - Standard Deductions

(HCV)
 • Alternate Reexamination Schedule – Activity: 3.b.
 Alternative Reexamination Schedule for Households (HCV)

G.3 Substantially the Same (STS) – Local, Non-Traditional.

Questions	Input options and instructions
Please provide the total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	<u>N/A</u> # of unit months
Please provide the total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	<u>N/A</u> # of unit months
How many units, developed under the local, non-traditional housing development activity, were available for occupancy during the prior full calendar year (by bedroom size)?	Please include only those units that serve households at or below 80% of AMI in the table provided.

PROPERTY NAME/ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
Name/Address	#	#	#	#	#	#	#	Type (below)	#	#	Y/N	\$
Name/Address	#	#	#	#	#	#	#	Type (below)	#	#	Y/N	\$

Name/Address	#	#	#	#	#	#	#	Type (below)	#	#	Y/N	\$
Totals	#	#	#	#	#	#	#		#	#		

* User will select one of the following from the “Population Type” dropdown box: General, Elderly, Disabled, Elderly/Disabled, Other

If the “Population Type” of is Other is selected, please state the Property Name/Address and describe the population type. [Text box]

** The federal accessibility standard under HUD’s Section 504 regulation is the Uniform Federal Accessibility Standards (UFAS) for purposes of Section 504 compliance. HUD recipients may alternatively use the 2010 ADA Standards for Accessible Design

under Title II of the ADA, except for certain specific identified provisions, as detailed in HUD’s Notice on “Instructions for use of alternative accessibility standard,” published in the Federal Register on May 23, 2014 (“Deeming Notice”) for purposes of Section 504 compliance, <https://www.govinfo.gov/content/pkg/FR-2014-05-23/pdf/2014-11844.pdf>. This would also include adaptable units as defined by HUD’s Section 504 regulation (See 24 CFR § 8.3 and § 8.22).

G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
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In order to demonstrate that the MTW statutory requirement of “maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration” is being achieved, the MTW agency will provide information for its most recently completed Fiscal Year in the following table.

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

Family Size:	Occupied Number of Local, NonTraditional units by Household Size
1 Person	N/A #
2 Person	N/A #
3 Person	N/A #
4 Person	N/A #
5 Person	N/A #
6+ Person	N/A #
Totals	N/A #

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G.5	Housing Quality Standards.
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Certification is included in MTW Certifications of Compliance for HCV and local, non-traditional program. The public housing program is monitored through physical inspections performed by the Real Estate Assessment Center (REAC).

H.	Public Comments.
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H.1	Input options and instructions
Please provide copy of all comments received by the public, Resident Advisory Board, and tenant associations.	Upload Attachment
Please attach a narrative describing the MTW agency’s analysis of the comments and any decisions made based on	Upload Attachment

these comments.	
If applicable, was an additional public hearing held for an Agency-Specific Waiver and/or Safe Harbor waiver?	N/A
If yes, please attach the comments received along with the MTW agency's description of how comments were considered.	N/A

I	Evaluations.
I.1	Please list any ongoing and completed evaluations of the MTW agency's MTW policies, that the PHA is aware of, including the information requested in the table below. In the box "title and short description," please write the title of the evaluation and a brief description of the focus of the evaluation.

Question	Input options and instructions
Does the PHA have an agency-sponsored evaluation?	No

Table I.1 - Evaluations of MTW Policies

Title and short description	Evaluator name and contact information	Time period	Reports available

J	MTW Certifications of Compliance.
J.1	The MTW agency must execute the MTW Certifications of Compliance form and submit as part of the MTW Supplement submission to HUD. Certification is provided below.

Moving to Work (MTW) Hardship Policy

MTW Agency-Specific Waiver Request - Tenant Rent Policies, Medical deduction flat percentage hardship

Participants can request a hardship waiver under the MTW Medical Deduction implementation. Participants that experience a negative change or are required to pay more out of pocket during the implementation can request an extension to remain at the current Housing Assistance Payment levels until the next annual review.

Family circumstances may change throughout the period between biennial reexaminations and between applicable households' annual lease anniversaries. HUD and GPHA policies dictate what kinds of information about changes in family circumstances must be reported, and under what circumstances the GPHA must process interim reexaminations to reflect those changes. HUD regulations also permit the GPHA to conduct interim reexaminations of income or family composition at any time. When an interim reexamination is conducted, only those factors that have changed are verified and adjusted. In addition to specifying what information the family must report, HUD regulations permit the family to request an interim determination if other aspects of the family's income or composition change. The GPHA must complete the interim reexamination within a reasonable time after the family's request. In determining the income for any family, GPHA may make other adjustments as it considers appropriate to reflect current income, taking into consideration any redetermination of income during such prior year(s).

At their annual lease anniversary between biennial reexaminations, GPHA will apply the applicable Cost-of-Living Adjustments for fixed-income households based on the source of fixed-income, where fixed income households will also be given an opportunity to request a hardship to the standard MTW medical / disability expense deduction, by certify their medical and/or disability expenses and provide proof of changes in those amounts if applicable.

Medical deduction flat percentage hardship

Participants can request a hardship under the MTW Medical Deduction implementation. Participants that experience a negative change or are required to pay more out of pocket during the implementation can request an extension to remain at the current Housing Assistance Payment levels until the next annual review.

The housing authority can provide documentation and refer the participant to economic assistance programs that might help in budgeting.

GPHA will include statements on letters explaining a hardship and how to apply. GPHA will create a standard form to assist participants in applying for a hardship.

There will be a limit of one to the number of interim reexaminations allowed to be requested. If a household believes they have another circumstance that qualifies as a financial hardship, they may request a hardship.

GPHA will include statements on letters explaining a hardship waiver and how to apply. GPHA will create a standard form to assist participants in applying for a hardship waiver.

Work Requirement

Participants can request a hardship waiver under the MTW Work Requirement implementation. This activity establishes an MTW work requirement which applies to all households with an abled bodied, non-elderly non-disabled adult in the household. The work requirement mandates that all able-bodied adults 18 years of age and older, work a minimum of 15 hours a week per individual or 30 hours per household.

GPHA will suspend the work requirement if unemployment rates rise above 8% in a locality. For example, if the unemployment rates reach 9% in one county, only that county would suspend the requirement until unemployment drops below the threshold.

GPHA will include statements on letters explaining a hardship waiver and how to apply. GPHA will create a standard form to assist participants in applying for a hardship waiver.

Work requirement waiver can be granted up to 90 days for the following reasons:

- Victim of domestic violence (VAWA) clients if requested.
- Program participants receiving SSI or other documented unearned income benefits greater than or equal to the maximum SSI payment.
- New parents being a primary caregiver of an infant under 6 months old.
- Reasons that meet Family Medical Leave Act (FMLA) if applicable under current employer and employment. Participant may be encouraged to seek TANF or other assistance.
- Temporary medical condition that results in work reduction (program participant will be encouraged to file worker's compensation or short-term disability where applicable).
- Administrative approved reasoning

Safe Harbor Waiver - 1.s. Elimination of Deduction(s) and 1.w. Alternative Income Inclusions/Exclusion

Safe Harbor Waivers seeking HUD Approval:

Will the MTW agency submit request for approval of a Safe Harbor Waiver this year? Yes .

(a) the name and number of the MTW Waiver and associated activity for which the MTW agency is seeking to expand the safe harbor,

1.s. Elimination of Deduction(s) and 1.w. Alternative Income Inclusions/Exclusions.

(b) the specific safe harbor and its implementing regulation,

1.s. Elimination of Deduction(s) and 1.w. Alternative Income Inclusions/Exclusions

(c) the proposed MTW activity the MTW agency wishes to implement via this Safe Harbor Waiver,

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.

If an eligible household with income has out-of-pocket expense deductions and supportive documentation such as medical insurance bills, ND HHS recipient expenses, Medicare deductions, tenant participation history, etc., GPHA will use the greater of deducting 15% of gross income or the elderly or disabled deduction under HUD regulations. Households that do not have qualifying deductions would receive the standard elderly or disabled deduction under HUD regulations.

Using the above utilization of criteria would allow for significant reduction of negative impacts via housing assistance programs and other economic assistance programs such as SNAP, Medicaid, Low Income Heating Assistance, ND Rent Rebate, etc.

This activity would apply to both HCV and Mainstream participants.

GPHA 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, unless at the time of a hardship request. 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.

Medical deduction flat percentage hardship

Participants can request a hardship under the MTW Medical Deduction implementation. Participants that experience a negative change or are required to pay more out of pocket during the implementation can request a 90-day extension to remain at the current Housing Assistance Payment levels or until the next annual review.

Example for medical expense exclusion. GPHA would use the standard deduction under HUD regulations and set the medical expense review cut-off to the HOTMA standard of 10% of gross income. If a household presents medical

expenses that would exceed the 10%, GPHA would exclude 15% of their gross income.

The housing authority can provide documentation and refer the participant to economic assistance programs that might help in budgeting.

GPHA will include statements on letters explaining a hardship and how to apply. GPHA will create a standard form to assist participants in applying for a hardship.

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.

This waiver would benefit elderly and disabled families and individuals, including non-elderly persons with disabilities under the Mainstream 5- year program.

Agency goals for MTW Activity:

This waiver may improve cost effectiveness in our effort to reduce the administrative burden. Decrease administrative time and costs required

to request, obtain, and follow up on tenant submission of medical and disability expense-related documents, allowing staff to focus on elderly and disabled households' other needs and other agency priorities. Additionally, this waiver will decrease burdensome documentation for participants and applicants, lowering barriers to participation.

Requested Waiver and Explanation

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. The standard elderly deduction would remain. Clients would receive the 15% gross income exclusion if the client has eligible expenses that exceed the deduction.

GPHA 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.

This waiver would benefit elderly and disabled families and individuals including non-elderly persons with disabilities under the Mainstream 5- year program.

This waiver may improve cost effectiveness in our effort to reduce the administrative burden. Decrease administrative time and costs required to request, obtain, and follow up on tenant submission of medical and disability expense-related documents, allowing staff to focus on elderly and disabled households' other needs and other agency priorities. Additionally, this waiver will decrease burdensome documentation for participants and applicants, lowering barriers to participation.

(d) a description of the local issue and why such an expansion is needed to implement the MTW activity,

This waiver may improve cost effectiveness in our effort to reduce the administrative burden. Decrease administrative time and costs required to request, obtain, and follow up on tenant submission of medical and disability expense-related documents, allowing staff to focus on elderly and disabled households' other needs and other agency priorities. Additionally, this waiver will decrease burdensome documentation for participants and applicants, lowering barriers to participation.

GPHA 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, unless at the time of a hardship request. 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.

Under activity 1.s. Elimination of Deduction(s) and activity 1.w. Alternative Income Inclusions/Exclusions, an agency must exempt elderly and disabled families from rent policy.* 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.

In order to enable elderly and disabled households to benefit from this waiver activity, a safe harbor waiver is needed.

(e) an impact analysis,

Enclosed

(i) a description of the hardship policy for the MTW activity, if applicable,

Enclosed.

(j) 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.

Safe Harbor Waiver - Activity: 1.w. Alternative Income Inclusions/Exclusions

- (a) the specific safe harbor and its implementing regulation,
- (b) the proposed MTW activity the MTW agency wishes to implement via this Safe Harbor Waiver,

Description:

GPHA proposes the following permissive exclusions:

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; and

Paid renter's insurance. Households must provide policy statements and documentation showing renter's insurance premium for the occupied unit.

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

HUD' Safe Harbor in its MTW Operations Notice states that the following condition is required, "i. Agency must exempt elderly and disabled individuals from this rent determination policy." However, HUD's MTW Operations Notice also describes a simplified process for MTW agencies to implement MTW activities outside of the safe harbors described in Appendix I. GPHA is seeking this Safe Harbor waiver in order to include all household types to benefit from this waiver activity, including elderly and disabled individuals and families.

Agency goals for MTW Activity:

By allowing paid child support and/or paid spousal support as permissive exclusion from income, GPHA's goal with this activity is to provide proper incentives for voucher-assisted households to make such payments in a timely fashion on behalf of their children by also having those amounts excluded from their income so that they are not "taxed" on their income for monies that they have paid out for this purpose. This will help support the goal of self-sufficiency.

By allowing voucher-assisted households to deduct paid renter's insurance, which is required of them, from their income, it will help to align the voucher program with this requirement and support the goal of self-sufficiency and housing choice.

MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve? Self-Sufficiency, Housing Choice and Cost Effectiveness

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

Increased HAP expenditures

Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

All assisted households

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

Both new admissions and currently assisted households.

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

This activity applies to all family types, (e.g. families with children, elderly, disabled, elderly non-disabled, and non-

elderly persons with disabilities under the Mainstream 5-year program.

For HCV activities:

This activity applies to all tenant-based units and properties with project-based vouchers.

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

GPHA proposes the following permissive exclusions:

- 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; and
- Paid renter's insurance. Households must provide policy statements and documentation showing renter's insurance premium for the occupied unit.

(c) a description of the local issue and why such an expansion is needed to implement the MTW activity,

By allowing paid child support and/or paid spousal support as permissive exclusion from income, GPHA's goal with this activity is to provide proper incentives for voucher-assisted households to make such payments in a timely fashion on behalf of their children by also having those amounts excluded from their income so that they are not "taxed" on their income for monies that they have paid out for this purpose. This will help support the goal of self-sufficiency.

By allowing voucher-assisted households to deduct paid renter's insurance, which is required of them, from their income, it will help to align the voucher program with this requirement and support the goal of self-sufficiency and housing choice.

HUD's Safe Harbor in its MTW Operations Notice states that the following condition is required, "i. Agency must exempt elderly and disabled individuals from this rent determination policy." However, GPHA is seeking this Safe Harbor waiver in order to include all household types to benefit from this waiver activity, including elderly and disabled individuals and families.

(d) an impact analysis

Enclosed.

(e) a description of the hardship policy for the MTW activity, if applicable, and

No hardship policy is applicable for this MTW activity

(f) 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.

MTW Supplement to the Annual PHA Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

OMB No. 2577-0226
Expires: 03/31/2024

Purpose. The Moving to Work (MTW) Supplement to the Annual PHA Plan informs HUD, families served by the PHA, and members of the public, about the MTW Waivers and associated activities that the MTW agency seeks to implement in the coming Fiscal Year and updates the status of MTW activities that have been previously approved. It also provides information about Safe Harbor Waivers, Agency-Specific Waivers, compliance with MTW statutory requirements, and evaluations. The MTW Supplement does not replace the PHA Plan. MTW agencies must continue to submit the applicable PHA Plan. MTW agencies that are not required to submit annual PHA Plans under the Housing and Economic Recovery Act of 2008 (HERA) must submit the MTW Supplement annually, in addition to holding public hearings, obtaining board approval, and consulting with Resident Advisory Boards (RABs) and tenant associations, as applicable, on planned MTW activities.

Applicability. Form HUD-50075-MTW is to be completed annually by all MTW agencies brought onto the MTW Demonstration Program pursuant to Section 239 of the Fiscal Year 2016 Appropriations Act, P.L. 114-113 (2016 MTW Expansion Statute) or legacy MTW agencies² that chose to follow the requirements of the MTW Operations Notice.

Definitions. All terms used in this MTW Supplement are consistent with the definitions stated in the MTW Operations Notice, including:

(1) **Local, Non-Traditional Activities (LNT)** – Those MTW activities that use MTW funding flexibility outside of the Housing Choice Voucher (HCV) and public housing programs established in Sections 8 and 9 of the U.S. Housing Act of 1937.

(2) **Safe Harbors** – The additional parameters or requirements, beyond those specified in the MTW activity description itself found in the MTW Operations Notice, following each activity description, that the MTW agency must follow in implementing MTW activities.

(3) **Substantially the Same Requirement** – A statutory MTW requirement that MTW agencies must continue to assist substantially the same total number of eligible low-income families as would have been served absent the MTW demonstration.

A.	PHA Information.
A.1	<p>PHA Name: Great Plains Housing Authority PHA Code: ND011 MTW Supplement for PHA Fiscal Year Beginning: 07/01/2025 PHA Program Type: Housing Choice Voucher (HCV) only, Mainstream Voucher 5 MTW Cohort Number: 5 MTW Supplement Submission Type: Amended Annual Submission</p>
B.	Narrative.
B.1	<p>MTW Supplement Narrative. The narrative provides the MTW agency with an opportunity to explain to the public, including the families that it serves, its MTW plans for the fiscal year and its short and long-term goals.</p> <p>The MTW agency should provide a description of how it seeks to further the three MTW statutory objectives during the coming Fiscal Year. Those three MTW statutory objectives are: (1) to reduce cost and achieve greater cost effectiveness in federal expenditures; (2) to give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient, and (3) to increase housing choices for low-income families.</p>

B. Narrative

GPHA have a vision where they 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 MTW 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 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 GPHA to further its partnerships with other agencies and state governments to provide stable and affordable housing opportunities and solutions to existing barriers.

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 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 exclusion of their gross income. GPHA would also provide income exclusions 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 use the Cost-of-Living-Adjustment (COLA) amount for calculating income and the households' rent share in the biennial reexamination year. These activities will help provide greater cost efficiency to administering GPHA's voucher program.

For non-elderly, non-disabled households, GPHA would implement a minimum income requirement of 15 hours per week per adult or 30 hours per week for a household. 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 and achieve greater program cost opportunities. GPHA will work with community partners to help qualifying individuals apply for Supplemental Security Income (SSI).

In addition, GPHA would increase the minimum rent portion to \$200 per month per households. This extends the HUD maximum while giving households the opportunity to request a hardship waiver if necessary. GPHA will discontinue the Work Requirement if the minimum rent is allowed at \$200. A flat minimum rent is easily implemented within the software system and allows for consistent messaging with clients, providers, landlords, and others.

There are several 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, and stabilize attrition rates.

Two income exclusions GPHA would implement include excluding paid renter’s insurance or landlord liability; and exclusion paid child support / spousal support. GPHA strongly encourages households to have renter’s insurance as required by most landlords. Including this as an exclusion would assist households in staying current on lease agreements and being insured. The other income exclusion encourages households to pay child support and spousal support. The child support and spousal support do not require court ordered agreements, but do require an informal agreement showing payment. Again, this policy helps reduce evictions and law enforcement issues, and financially balances two households.

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.

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.

The following MTW activities will apply to GPHA’s special purpose voucher program - Mainstream 5-year program.

- Activity 1. F Minimum Rent (HCV & MS5)
- Activity 1.W. – Alternative Income Inclusions/Exclusions (HCV & MS5)
- Activity: 12.B. Work Requirement (HCV & MS5)
- Activity: 17.C. Local, Non-Traditional Activities - Housing Development Programs (HCV & MS5)
- MTW Safe Harbor Waiver Request - Activity: 1.W. Alternative Income Inclusions/Exclusions (HCV & MS5)
- MTW Safe Harbor Waiver Request – Activity 1.F. Minimum Rent (HCV & MS5)

C.	MTW Waivers and Associated Activities.
	NOTE: MTW agencies are reminded that all MTW Waivers and associated activities must be implemented in accordance with the MTW Operations Notice and within its safe harbors unless a Safe Harbor or Agency-Specific Waiver approval is provided by HUD, in which case, the activity utilizing the Safe Harbor or Agency-Specific Waiver must be implemented in accordance with the terms of the approval.

Screeners	<p>For all MTW Waivers and Activities in Section C, the screening question listed below will be presented in the fillable form. This will allow the form to only display those waivers that input where is required. Each waiver and activity will be listed with the following choices. If “Not Currently Implemented” is selected, the agency will not be shown any further questions for the activity.</p> <ul style="list-style-type: none"> • Currently Implementing • Plan to Implement in the Submission Year • Will be Discontinued in the Submission Year • Was Discontinued in a previous Submission Year • Not Currently Implemented
Core Questions	<p>The following core questions apply to all of the MTW Waivers and associated activities listed in the MTW Operations Notice. The core questions collect basic information about any MTW activity proposed or implemented by MTW agencies.</p>

Text	Input options and instructions
<p>Narrative. 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.</p>	<p>Text box [Note: If an MTW agency has the same MTW activity in both its public housing and HCV programs, it receives instructions to just write one narrative explaining that it covers both programs.]</p>
<p>MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?</p>	<p>(Check at least one)</p> <p><input type="checkbox"/> Cost effectiveness</p> <p><input type="checkbox"/> Self-sufficiency</p> <p><input type="checkbox"/> Housing choice</p>
<p>Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p>	<p>(Check at least one)</p> <p><input type="checkbox"/> Neutral (no cost implications)</p> <p><input type="checkbox"/> Increased revenue</p> <p><input type="checkbox"/> Decreased revenue</p> <p><input type="checkbox"/> Increased expenditures</p> <p><input type="checkbox"/> Decreased expenditures</p>
<p>Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p>	<p><input type="checkbox"/> The MTW activity applies to all assisted households</p> <p><input type="checkbox"/> The MTW activity applies only to a subset or subsets of assisted households</p> <p><i>If the agency selects “The MTW activity applies only to a subset or subsets of assisted households” then the agency will receive the following three questions:</i></p>
<p>Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted</p>	<p>(Check one)</p> <p><input type="checkbox"/> New admissions (i.e., applicants) only</p> <p><input type="checkbox"/> Currently assisted households only</p>

households?	<input type="text"/> New admissions and currently assisted households
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Text	Input options and instructions
Family Types. Does the MTW activity apply to all family types or only to selected family types?	<input type="text"/> The MTW activity applies to all family types <input type="text"/> The MTW activity applies only to selected family types <i>If the agency selects “The MTW activity applies to all family types” it does not get any further questions about family types. If the agency selects “The MTW activity applies only to selected family types” it is presented the following question and options:</i> Please select the family types subject to this MTW activity: <input type="text"/> Non-elderly, non-disabled families <input type="text"/> Elderly families <input type="text"/> Disabled families (to the extent those families are not exempt via a reasonable accommodation) <input type="text"/> Other – another specifically defined target population or populations. Please describe this target population in the text box. [Text box]

<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For PH activities: Does the MTW activity apply to all public housing developments?</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For PH activities: _____The MTW activity applies to all developments _____The MTW activity applies to specific developments <i>If the agency selects “The MTW activity applies to specific developments” then it is presented the follow up question:</i></p> <p>Which developments participate in the MTW activity? [agencies choose the applicable development number(s) from a list of their public housing developments]</p> <p>For HCV activities: _____The MTW activity applies to all tenant-based units _____The MTW activity applies to all properties with project-based vouchers _____The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers <i>If the agency selects “The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers” then it is presented the follow up question:</i> Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity. [Text box]</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p>	<p>Yes/No [If Yes]: What is the status of the Safe Harbor Waiver request? _____The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D). _____The waiver was previously approved. [If checked]: Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency’s goal in implementing this MTW activity. [Text box]</p>
<p>Does this MTW activity require a hardship policy?</p>	<p>Yes/No/Already provided [If Yes]: Upload Hardship Policy [If No, skip below Hardship Policy questions] [If Already provided, the agency has already provided the Hardship Policy under another activity and indicated that the policy is also applicable to this activity.]</p>
<p>Does the hardship policy apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</p>	<p>Yes/No [If yes, a list will be presented to select the applicable MTW activities]</p>

Text	Input options and instructions
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?	Yes/No [If Yes, then a further question pops up.]: What considerations led the MTW agency to modify the hardship policy? [Text box]
How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?	_____ [Numerical entry only] [if number > 0, further questions pop up]: _____ How many hardship requests were approved? [Numerical entry only] _____ How many hardship requests were denied? [Numerical entry only] _____ How many are pending? [numerical entry only]
Does the MTW activity require an impact analysis?	Yes/No/Already provided [If Yes]: Upload Impact Analysis [If No, skip the below Impact Analysis questions] [If Already provided, the agency has already provided the impact analysis under another activity and indicated that the policy is also applicable to this activity.]
Does the impact analysis apply to more than this MTW activity? If yes, then please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)	Yes/No [If yes, a list will be presented to select the applicable MTW activities]
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.	[Text box]
Please provide an explanation as to why the activity was discontinued or will be discontinued.	[Will only apply if "Will be Discontinued in the Submission Year" or "Was Discontinued in a previous Submission Year" is selected in the screener.] [Text box]

Custom Questions	Custom questions are tailored to each MTW activity. In what follows, the MTW activities are listed with their custom questions. The final online version of the MTW Supplement will be set up so that if an MTW activity is the same in the HCV and/or public housing programs, the MTW agency fills in the information for public housing, then the information is auto populated for the HCV program. MTW agencies are asked to fill in answers only to questions that are relevant to the MTW activities they propose to implement or are already implementing.
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C.1	Tenant Rent Policies
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1.a., 1.b. - Tiered Rent (PH & HCV)	Input options and instructions
Please describe how the income bands are structured.	[Text box]

Please upload the tiered rent policy table that shows the income bands.	[Upload document]
What is the income basis for assigning households to income bands?	<input type="checkbox"/> This activity uses adjusted annual income as defined in 24 CFR 5.611 (as required for non-MTW PHAs) <input type="checkbox"/> This activity uses a different definition of income because we are using the following MTW waivers (check all that apply) <input type="checkbox"/> 1.r. and/or 1.s. "elimination of deductions" <input type="checkbox"/> 1.t. and/or 1.u. "standard deductions" <input type="checkbox"/> 1.v. and/or 1.w "alternative inclusions and exclusions"

1.c., 1.d. - Stepped Rent (PH & HCV)	Input options and instructions
Describe how the stepped rent is structured, including the following: how each household's rent will be set in the first year; how frequently rents will change and by what amount; and how the stepped rent will end (i.e., what is the maximum rent). Please	Description [Text box] Stepped rent schedule [Upload document]

1.c., 1.d. - Stepped Rent (PH & HCV)	Input options and instructions
upload a document that presents the stepped rent schedule in the form of a table.	
If a household progresses all the way through the stepped rent schedule, what will their status be?	<input type="checkbox"/> They will no longer receive a subsidy <input type="checkbox"/> They will continue to receive a shallow subsidy <input type="checkbox"/> Other\Not Applicable. [If checked]: Please explain [Text box]

1.e., 1.f. - Minimum Rent (PH & HCV)	Input options and instructions
How much is the minimum rent or minimum Total Tenant Payment (TTP)?	\$200
Current minimum rent is \$50	Remove 12B if minimum rent is approved.

1.g., 1.h. - Tenant Payment as a Modified Percentage of Income (PH & HCV)	Input options and instructions
What percentage of income will equal the Total Tenant Payment (TTP)?	<input type="text"/> %
What is the income basis for calculating Total Tenant Payment?	<input type="checkbox"/> This activity uses adjusted annual income as defined in 24 CFR 5.611 (as required for non-MTW PHAs) <input type="checkbox"/> This activity uses a different definition of income because we are using the following MTW waivers (check all that apply) <input type="checkbox"/> 1.r. and/or 1.s. "elimination of deductions" <input type="checkbox"/> 1.t. and/or 1.u. "standard deductions" <input type="checkbox"/> 1.v. and/or 1.w "alternative inclusions and exclusions"

1.i., 1.j. - Alternative Utility Allowance (PH & HCV)	Input options and instructions
Please describe the alternative method of calculating the utility allowances. Please explain how the method of calculating utility allowances is different from the standard method and what objective the MTW agency aims to achieve by using this alternative method.	[Text box]

1.k., 1.l. - Fixed Rents/Subsidy (PH & HCV)	Input options and instructions
Describe the method used to establish the fixed rents.	[Text box]
How many households are currently subject to this policy?	[Text box]

Table 1.k.1, 1.l.1 - What is the fixed rent/subsidy for each of the following unit sizes?

Unit Size	Rent Amount	Subsidy

	- PH	Amount - HCV
Studio/Efficiency	\$	\$
One-bedroom	\$	\$
Two-bedroom	\$	\$
Three-bedroom	\$	\$
Four or more bedrooms	\$	\$

1.m., 1.n. - Utility Reimbursements (PH & HCV)	[No custom questions for this activity.]
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1.o. - Initial Rent Burden (HCV)	Input options and instructions
If the MTW agency plans to implement a new maximum income- based rent percentage (higher than 40% of adjusted monthly income), what is that maximum?	_____ %

1.p., 1.q. - Imputed Income (PH & HCV)	Input options and instructions
Does the imputed income policy assume a set number of hours worked per individual or per household?	(Check one) <input type="checkbox"/> Per individual <input type="checkbox"/> Per household
How many hours per week are assumed?	[Number entries between 0 and 15 or 0 and 30, as appropriate, allowed]
What is the assumed wage rate?	[Must be a number less than or equal to the federal minimum wage]

1.p., 1.q. - Imputed Income (PH & HCV)	Input options and instructions
How many households are currently subject to this policy?	_____ [number]

1.r., 1.s. - Elimination of Deduction(s) (PH & HCV)	Input options and instructions
Which deduction(s) will be eliminated, modified, or added?	(Check all that apply) _____ Dependent allowance _____ Unreimbursed childcare costs <input checked="" type="checkbox"/> Other (please explain) – GPHA would replace the medical expense deductions and create a 15% income exclusion to qualifying households.

1.t., 1.u. - Standard Deductions (PH & HCV)	Input options and instructions
How much will the single standard deduction be in the Fiscal Year?	\$ _____

1.v., 1.w. - Alternative Income Inclusions/Exclusions (PH & HCV)	Input options and instructions
What inclusions or exclusions will be eliminated, modified, or added?	GPHA would create two new exclusions. <ol style="list-style-type: none"> 1) Exclude paid child support or paid spousal support. Family arrangements may be court ordered or informal agreements (notarized). Participant must provide payment proof. 2) Exclude paid renter’s insurance or landlord liability. This is required by many landlords and enforceable by ND law.

Activity: 12.b. Work Requirement (HCV)	
<p>Narrative. 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.</p>	<p><i>Description:</i> This activity applies to Housing Choice Voucher (HCV) and Mainstream Voucher (MS5) participants.</p> <p>This activity establishes an MTW work requirement which applies to all households with an abled bodied, non-elderly non-disabled adult in the household. The work requirement mandates that all able-bodied adults 18 years of age and older, work a minimum of 15 hours a week per individual or 30 hours per household. Full-time enrollment in a post-secondary education program or work training program satisfies the work requirement. An adult child in the household is also subject to the work requirement. Failure to meet the work requirement is a program violation and cause for termination.</p> <p>Following are the exemptions to the work requirement and MTW rent structure:</p> <ul style="list-style-type: none"> • Elderly/Disabled Status - All adult household members age 62 or over, or who have disability status that prevents employment. • Temporary Medical Exemption - verified medical condition of a household member lasting longer than three months that limits or that prevents work activities. Must be

certified to by a licensed physician or medical practitioner.

- Discretionary Exemption - households with only one adult who does not have elderly/disability status and who, due to limitations of employment experience, education or training, or other significant barriers, is unable to earn sufficient income to meet the MTW minimum rent requirement.

- Work Requirement Exemption Only - Households receiving TANF Cash Assistance with one adult member who has been determined "not mandatory for work." The household will receive assistance under the MTW rent structure, but the person will not be subject to the work requirement.

Exempt households may elect annually to participate in the MTW rent structure if they meet the work requirement through employment income.

Failure to meet the work requirement results in a lease violation. If not corrected, tenant rent goes to full market rate for the unit.

HUD's Safe Harbor waivers require:

- i. If the work requirement policy applies to all eligible individuals—the maximum requirement would be 15 hours of work per week per individual.
- ii. If the work requirement policy applies to all eligible households, the maximum requirement would be 30 hours of work per week per household.
- iii. Prior to implementation, all residents shall be given notice six months in advance of the sanction policy for non-compliance.
- vi. The work requirement may apply to non-elderly, non-disabled households or non-elderly, non-disabled adult household members.*
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 in both the public housing and HCV programs.*
- viii. 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.
- ix. 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.
- x. Work requirements shall not be applied to exclude, or have the effect of excluding, the admission into housing or participation in supportive services by persons with disabilities or elderly individuals, or families that include persons with disabilities or elderly individuals.*
- iv. Agency must conduct an annual impact analysis.*
- xi. Agency must implement a hardship policy, including a policy to address tenants seeking a determination of disability status.*
- xii. 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.*
- xiii. The ACOP and/or Administrative Plan must also describe the consequences of failure to comply with the work requirement.*

Agency goals for MTW Activity:

GPHA's goal for this activity/waiver is to increase the average

	earned income of households participating in the MTW work requirement, as well as increased work training and enrollment in post-secondary education programs. In doing so, the goal is to increase families' self-sufficiency, housing choice and the cost effectiveness of GPHA's program.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	Self-Sufficiency Housing Choice Cost Effectiveness
Cost implications. 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
Different policy by household status/family types/sites? 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.
Household Status. 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
Family Types. Does the MTW activity apply to all family types or only to selected family types?	The MTW activity applies only to selected family types. The MTW activity applies to all households with a non-elderly non-disabled adult in the household.
Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV. For HCV activities: Does the MTW activity apply to all HCV tenant- based units and properties with project-based vouchers?	For HCV activities: The MTW activity applies to all properties with project- based vouchers
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	Yes
Does the MTW activity require an impact analysis?	Yes
Custom Questions: Custom questions are tailored to each MTW activity.	
Does the work requirement MTW activity exempt any type of household or individual other than those required to be excluded through the MTW Operations Notice or those excluded as a reasonable accommodation?	Yes [If Yes]: Please describe the conditions for exemption. Program participants receiving SSI, SSDI, or other benefits would be exempt. GPHA has the ability to suspend the requirement if unemployment rises above 8% in a locality.
What counts as "work" under this the work requirement MTW activity?	Employment, self-employment, or other documented earned income. GPHA does not require employment be within the counties covered. GPHA will allow participants to work remotely or telecommute.
How will the MTW agency monitor compliance with the work requirement MTW activity?	GPHA would require program participants to report income during annual reviews and monitor using IVT and EIV. Landlords/owners would report if program participants are not paying rent or utility portions.
What supportive services are offered to support households to comply with the work requirement?	GPHA is actively working with Job Service North Dakota, Jamestown Public Schools, North Dakota Commerce, and other regional organizations to help program participants improve job skills, understand financial documents, locate employment and training opportunities, and use child care assistance where available. GPHA may use HAP funding to assist with education through specific programs and transportation needs for up to 60 days to help participants get trained as identified in the admin plan.
How does the agency address noncompliance with the work requirement policy?	Program participants would be given a warning with notification of hardship waivers. Second notice would be termination for program violation. Landlords may give program participants and housing authority notice if behind on rent or utilities.
How many households are currently subject to the policy?	GPHA's analysis shows 126 households would be subject to the policy.
How many households in the most recently completed PHA	None, this is a new MTW activity.

fiscal year were sanctioned for non-compliance with the work requirement?	
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Activity: C. 17.c. Local, Non-Traditional Activities - Housing Development Programs	
<p>Narrative. 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.</p>	<p><i>Description:</i> This activity applies to Housing Choice Voucher (HCV) and Mainstream Voucher (MS5) participants.</p> <p>Under this activity, GPHA may utilize MTW funding to acquire, renovate and/or build affordable housing units that meet HUD requirements for MTW "local, non-traditional housing" as defined in HUD PIH Notice 2011-45 or successor notices. GPHA may utilize this activity to provide gap financing (grants or loans) to affordable housing developments including, but not limited to, PBV developments, Low Income Housing Tax Credit developments and/or other eligible development activities, subject to approval by the GPHA's Board of Commissioners. GPHA may also use MTW funds as gap financing to support local nonprofits in the acquisition, rehabilitation, or development of small- to medium-sized properties in our service area. MTW funds likely would be provided in the form of a loan or recoverable grant. GPHA may also use MTW funds for gap financing and to support its other owned or substantially controlled developments to leverage third-party debt in the form of tax-exempt bond financing, LIHTC equity, and other local sources. GPHA may expend MTW funds including Housing Assistance Payments and/or HCV Administrative Fee reserves on such activities if it shall not expend more than 10% of its Housing Assistance Payments budget on local, non-traditional activities including this housing development activity.</p> <p>In implementing this activity, GPHA shall: 1) ensure that families assisted meet the HUD definition of "low-income"; 2) comply with PIH Notice 2011-45 as applicable; 3) comply with Section 30 of the US Housing Act of 1937; and 4) Competitively bid any MTW funding awarded through this activity to a third-party provider.</p> <p><i>Agency goals for MTW Activity:</i></p> <p>This activity supports the goals to increase housing choices for low-income households and to leverage additional funds for affordable housing development.</p>
<p>MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?</p>	Housing choice
<p>Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p>	Increased expenditures
<p>Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p>	This activity applies to Housing Choice Voucher (HCV) and Mainstream Voucher (MS5) participants.
<p>Household Status. Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p>	Both new admissions and currently assisted households
<p>Family Types. Does the MTW activity apply to all family types or only to selected family types?</p>	The MTW activity applies to all family types, including non-elderly persons with disabilities under the Mainstream 5-year program.

<p>Location. Depending on if responses are being provided for a public housing (PH) or HCV activity, the agency will either see questions applicable to PH or HCV.</p> <p>For HCV activities: Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p>	<p>For HCV activities: The MTW activity applies to all properties with project-based vouchers</p>
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?	No
Does this MTW activity require a hardship policy?	No
Does the MTW activity require an impact analysis?	No
Custom Questions: Custom questions are tailored to each MTW activity.	
Does the MTW activity apply to all LNT units/properties?	The MTW activity applies to specific units/properties
Describe which LNT units/properties participate in the MTW activity?	<p>GPHA may use MTW funds to support local nonprofits in the acquisition, rehabilitation, or development of small- to medium- sized properties in our service area. MTW funds likely would be provided in the form of a loan or recoverable grant. MMNA may also use MTW funds to support its other owned or substantially controlled developments to leverage third-party debt in the form of tax-exempt bond financing, LIHTC equity, and other local sources.</p> <p>The cost implications for this activity are limited to the amount of MTW funding used to cover the financing gap on a given project. While the amounts of potential loans or grants to a nonprofit are not identified yet, GPHA does not expect contributions for individual projects to exceed \$100,000. If the funds are structured as a loan to a LIHTC partnership, the funds will be returned over time in the form of loan payments (which likely will be longer- term maturity or deferred loans). In most cases, regardless of ownership, this funding will be in the form of a loan, resulting in no cost implications to GPHA.</p>

17.c. - Housing Development Programs

For each LNT housing development that the MTW agency will commit funds to or spend funds on in this Fiscal Year, in Table 17.c.1 below please add the name of the development to one column heading and then provide the requested information, including the MTW agency role (Acquisition, Rehabilitation, or New Construction), the type of MTW agency financing (Gap Financing, Tax Credit Partnership, Other), and the total number of affordable units in the development. If possible, please provide a breakdown of the number of affordable units by level of affordability.

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 - 60% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other

Housing Development Programs that the MTW Agency plans to spend funds on in the 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 - 60% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other

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 - 60% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other

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 - 60% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other

D.	Safe Harbor Waivers
D.1 Safe Harbor Waivers seeking HUD Approval:	Yes
Will the MTW agency submit a request for approval of a Safe Harbor Waiver this year?	
D.	Safe Harbor Waivers.
D.1	<p>Safe Harbor Waivers seeking HUD Approval:</p> <p>The MTW Operations Notice describes a simplified process for MTW agencies to implement MTW activities outside of the safe harbors described in Appendix I. For each Safe Harbor Waiver request, a document that includes the following information must be provided: (a) the name and number of the MTW Waiver and associated activity for which the MTW agency is seeking to expand the safe harbor, (b) the specific safe harbor and its implementing regulation, (c) the proposed MTW activity the MTW agency wishes to implement via this Safe Harbor Waiver, (d) a description of the local issue and</p>

why such an expansion is needed to implement the MTW activity, (e) an impact analysis, (f) a description of the hardship policy for the MTW activity, if applicable, and (g) 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 request for approval of a Safe Harbor Waiver this year?

Yes .

(a) the name and number of the MTW Waiver and associated activity for which the MTW agency is seeking to expand the safe harbor,

Activity: 1.W. Alternative Income Inclusions/Exclusions

Activity: 1.F. Minimum Rent

Safe Harbor Waivers seeking HUD Approval:

The MTW Operations Notice describes a simplified process for MTW agencies to implement MTW activities outside of the safe harbors described in Appendix I. For each Safe Harbor Waiver request, a document that includes the following information must be provided: (a) the name and number of the MTW Waiver and associated activity for which the MTW agency is seeking to expand the safe harbor, (b) the specific safe harbor and its implementing regulation, (c) the proposed MTW activity the MTW agency wishes to implement via this Safe Harbor Waiver, (d) a description of the local issue and why such an expansion is needed to implement the MTW activity, (e) an impact analysis, (f) a description of the hardship policy for the MTW activity, if applicable, and (g) 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 request for approval of a Safe Harbor Waiver this year? Yes .

(a) the name and number of the MTW Waiver and associated activity for which the MTW agency is seeking to expand the safe harbor,

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

F.	Public Housing Operating Subsidy Grant	
<p>F. 1 Please provide the public housing Operating Subsidy grant information in the table below for Operating Subsidy grants appropriated in each Federal Fiscal Year the PHA is designated an MTW PHA.</p>	N/A	

G.	MTW Statutory Requirements.	
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<p>75% Very Low Income – Local, Non-Traditional. 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</p>	N/A	
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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.	
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H.	Public Comments.
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Please provide copy of all comments received by the public, Resident Advisory Board, and tenant associations.
Please attach a narrative describing the MTW agency’s analysis of the comments and any decisions made based on these comments.
If applicable, was an additional public hearing held for an Agency-Specific Waiver and/or Safe Harbor waiver?	N/A

I.	Evaluations.
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Please list any ongoing and completed evaluations of the MTW agency’s MTW policies that the PHA is aware of, including the information requested in the table below. In the box “title and short description,” please write the title of the evaluation and a brief description of the focus of the evaluation.	N/A
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J.	MTW Certifications of Compliance.
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The MTW agency must execute the MTW Certifications of Compliance form and submit as part of the MTW Supplement submission to HUD.	Completed
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E.	Agency-Specific Waivers.
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E.1	<p>Agency-Specific Waivers for HUD Approval:</p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency’s description of how the comments were considered, as a required attachment to the MTW Supplement</p>
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Custom Questions: Custom questions are tailored to each MTW activity.	
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Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?	No
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E.2	Agency-Specific Waiver(s) for which HUD Approval has been Received: For each previously approved Agency-Specific Waiver(s), a set of questions will populate. Does the MTW agency have any approved Agency-Specific Waivers? Yes [If no, question set concludes]
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F.	Public Housing Operating Subsidy Grant Reporting.
F.1	Please provide the public housing Operating Subsidy grant information in the table below for Operating Subsidy grants appropriated in each Federal Fiscal Year the PHA is designated an MTW PHA.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
N/A	N/A	N/A	N/A	N/A

G.	MTW Statutory Requirements.
G.1	<p>75% Very Low Income – Local, Non-Traditional.</p> <p>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.</p>

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

*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.
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Question	Input options and instructions
Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?	<p>Yes [If Yes]: please describe the MTW agency’s plans for its future rent reform activity and the implementation timeline. Please see detailed explanations above for each of the following rent reforms, all to take commence implementation effective July 1, 2023.</p> <ul style="list-style-type: none"> Tenant Rent Policy – Activity: 1.o. Initial Rent Burden (HCV); and Activity: 1.u. - Standard Deductions

(HCV)
 • Alternate Reexamination Schedule – Activity: 3.b.
 Alternative Reexamination Schedule for Households (HCV)

G.3 Substantially the Same (STS) – Local, Non-Traditional.

Questions	Input options and instructions
Please provide the total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	<u>N/A</u> # of unit months
Please provide the total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	<u>N/A</u> # of unit months
How many units, developed under the local, non-traditional housing development activity, were available for occupancy during the prior full calendar year (by bedroom size)?	Please include only those units that serve households at or below 80% of AMI in the table provided.

PROPERTY NAME/ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
Name/Address	#	#	#	#	#	#	#	Type (below)	#	#	Y/N	\$
Name/Address	#	#	#	#	#	#	#	Type (below)	#	#	Y/N	\$

Name/Address	#	#	#	#	#	#	#	Type (below)	#	#	Y/N	\$
Totals	#	#	#	#	#	#	#		#	#		

* User will select one of the following from the “Population Type” dropdown box: General, Elderly, Disabled, Elderly/Disabled, Other

If the “Population Type” of is Other is selected, please state the Property Name/Address and describe the population type. [Text box]

** The federal accessibility standard under HUD’s Section 504 regulation is the Uniform Federal Accessibility Standards (UFAS) for purposes of Section 504 compliance. HUD recipients may alternatively use the 2010 ADA Standards for Accessible Design

under Title II of the ADA, except for certain specific identified provisions, as detailed in HUD’s Notice on “Instructions for use of alternative accessibility standard,” published in the Federal Register on May 23, 2014 (“Deeming Notice”) for purposes of Section 504 compliance, <https://www.govinfo.gov/content/pkg/FR-2014-05-23/pdf/2014-11844.pdf>. This would also include adaptable units as defined by HUD’s Section 504 regulation (See 24 CFR § 8.3 and § 8.22).

G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
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In order to demonstrate that the MTW statutory requirement of “maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration” is being achieved, the MTW agency will provide information for its most recently completed Fiscal Year in the following table.

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

Family Size:	Occupied Number of Local, NonTraditional units by Household Size
1 Person	N/A #
2 Person	N/A #
3 Person	N/A #
4 Person	N/A #
5 Person	N/A #
6+ Person	N/A #
Totals	N/A #

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G.5	Housing Quality Standards.
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Certification is included in MTW Certifications of Compliance for HCV and local, non-traditional program. The public housing program is monitored through physical inspections performed by the Real Estate Assessment Center (REAC).

H.	Public Comments.
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H.1	Input options and instructions
Please provide copy of all comments received by the public, Resident Advisory Board, and tenant associations.	Upload Attachment
Please attach a narrative describing the MTW agency’s analysis of the comments and any decisions made based on	Upload Attachment

these comments.	
If applicable, was an additional public hearing held for an Agency-Specific Waiver and/or Safe Harbor waiver?	N/A
If yes, please attach the comments received along with the MTW agency's description of how comments were considered.	N/A

I	Evaluations.
I.1	Please list any ongoing and completed evaluations of the MTW agency's MTW policies, that the PHA is aware of, including the information requested in the table below. In the box "title and short description," please write the title of the evaluation and a brief description of the focus of the evaluation.

Question	Input options and instructions
Does the PHA have an agency-sponsored evaluation?	No

Table I.1 - Evaluations of MTW Policies

Title and short description	Evaluator name and contact information	Time period	Reports available

J	MTW Certifications of Compliance.
J.1	The MTW agency must execute the MTW Certifications of Compliance form and submit as part of the MTW Supplement submission to HUD. Certification is provided below.

Safe Harbor Waiver - 1.F. Minimum Rent

Safe Harbor Waivers seeking HUD Approval:

Will the MTW agency submit request for approval of a Safe Harbor Waiver this year? Yes .

- (a) the name and number of the MTW Waiver and associated activity for which the MTW agency is seeking to expand the safe harbor,

1.F. Minimum Rent.

- (b) the specific safe harbor and its implementing regulation,

Requesting waiver on the minimum rent must not exceed \$130 per month and agency must exclude elderly and disabled families from rent policy. This request is for HCV and Mainstream (MS5). GPHA wishes to set the minimum rent at \$200 and include all household members.

- (c) the proposed MTW activity the MTW agency wishes to implement via this Safe Harbor Waiver,

GPHA would like to raise the minimum rent to \$200 per month and allow this to include elderly and disabled households. The amount is easy for households to understand and agencies to explain. Most elderly and disabled households already meet this threshold. GPHA feels increasing the minimum rent a higher standard would help promote self-sufficiency and reduce the administrative burden of implementing Work Requirements. In addition, the minimum rent would reduce the reliance on utility allowance payments and confusion with providers.

Having one minimum rent across programs and demographics reduces burden and confusion. This amount is already under the cap for most social security fixed households while promoting self-sufficiency.

- (d) a description of the local issue and why such an expansion is needed to implement the MTW activity,

GPHA believes in the goal of self-sufficiency, as does HUD. Partnerships still exist and will continue to help program participants become employed, improve education, or properly care for household members. However, a higher minimum rent will help encourage participants to seek those opportunities with easier understanding of basic reporting.

- (e) an impact analysis,

Enclosed

- (i) a description of the hardship policy for the MTW activity, if applicable,

Enclosed.

(j) 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.

Hardship policies: Activity 1.F. Minimum Rent HCV & MS5

Participants can request a hardship waiver under the MTW Minimum Rent implementation.

GPHA will include statements on letters explaining a hardship waiver and how to apply. GPHA will create a standard form to assist participants in applying for a hardship waiver.

GPHA will include the Minimum Rent information and waiver information in the annual and initial certification process, and include Minimum Rent information briefing communication.

If a program participant is facing termination, GPHA will review the waiver allowances prior to issuing a termination and request the participant apply for waivers.

Any waivers are reviewed by the housing authority within 15 working days. The participant case is placed on "Hold" until a waiver is review and properly vetted. If a hardship exists, the housing authority will immediately create a new interim and implement the waiver. If there is no hardship, the participant may face termination, repayment agreement, and have no certification change.

Minimum Rent waiver can be granted up to 180 days for the following reasons:

- Victim of domestic violence (VAWA) clients if requested.
- Program participants receiving SSI or other documented unearned income benefits greater than or equal to the maximum SSI payment.
- Reasons that meet Family Medical Leave Act (FMLA) if applicable under current employer and employment. Participant may be encouraged to seek TANF or other assistance.
- Temporary medical condition that results in work reduction (program participant will be encouraged to file worker's compensation or short-term disability where applicable).
- Caregivers of a household member with disabilities and not receiving other caregiving services.
- Fixed income households that do not receive the minimum SSI amount.
- Administrative approved reasoning.

Voucher clients can have multiple waivers if a waiver reason continues to exist. In addition to the Minimum Rent Hardship form, clients would need to supply the housing authority with a Zero Income form.

A) The name and number of the MTW Waiver and associated activity for which the MTW agency is seeking to expand the safe harbor,
Safe Harbor Waiver - Activity: 1.w. Alternative Income Inclusions/Exclusions

B) the specific safe harbor and its implementing regulation,
Safe Harbor 1W – Exempting elderly and disabled individuals from this rent determination policy.

C) the proposed MTW activity the MTW agency wishes to implement via this Safe Harbor Waiver

Description:

GPHA proposes the following income exclusions:

- 1) 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. If an eligible household with income has out-of-pocket expense deductions and supportive documentation such as medical insurance bills, ND HHS recipient expenses, Medicare deductions, tenant participation history, etc., GPHA will use the greater of deducting 15% of gross income and the elderly or disabled deduction under HUD regulations. Households that do not have qualifying deductions would receive the standard elderly or disabled deduction under HUD regulations.
- 2) 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; and
- 3) Paid renter's insurance. Households must provide policy statements and documentation showing renter's insurance premium for the occupied unit.

Clients must stay current on income and family composition reporting to receive income exclusion(s). Clients that fail to report changes are subject to repayment.

HUD' Safe Harbor in its MTW Operations Notice states that the following condition is required, "i. Agency must exempt elderly and disabled individuals from this rent determination policy." However, HUD's MTW Operations Notice also describes a simplified process for MTW agencies to implement MTW activities outside of the safe harbors described in Appendix I. GPHA is seeking this Safe Harbor waiver in order to include all household types to benefit from this waiver activity, including elderly and disabled individuals and families.

Agency goals for MTW Activity:

- 1) GPHA 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, unless at the time of a hardship request. 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.

The medical exclusion would help clients and the agency prepare for HOTMA changes and eliminate “calculation” swings that occur when clients have medical expense changes.

- 2) By allowing paid child support and/or paid spousal support as an income exclusion, GPHA’s goal with this activity is to provide proper incentives for voucher-assisted households to make such payments in a timely fashion on behalf of their children by also having those amounts excluded from their income so that they are not “taxed” on their income for monies that they have paid out for this purpose. This will help support the goal of self-sufficiency, reduce law enforcement issues, encourage incomes in both households, and increases housing stability.
- 3) By allowing voucher-assisted households to exclude paid renter’s insurance, which is required of them, from their income, it will help to align the voucher program with this requirement and support the goal of self-sufficiency, housing choice, and reducing eviction.

MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve? Self-Sufficiency, Housing Choice and Cost Effectiveness

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

Increased HAP expenditures

Different policy by household status/family types/sites? Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

All assisted households

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

Both new admissions and currently assisted households.

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

This activity applies to all family types, (e.g. families with children, elderly, disabled, elderly non-disabled, and non-elderly persons with disabilities under the Mainstream 5-year program.

For HCV activities:

This activity applies to all tenant-based units and properties with project-based vouchers.

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

- GPHA proposes the following income exclusions:
- Medical expense exclusion to flat percentage of 15%.
- 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; and
- Paid renter’s insurance. Households must provide policy statements and documentation showing renter’s insurance premium for the occupied unit.

(a) a description of the local issue and why such an expansion is needed to implement the MTW activity,

By allowing paid child support and/or paid spousal support as income exclusion, GPHA’s goal with this activity is to provide proper incentives for voucher-assisted households to make such payments in a timely fashion on behalf of their children by also having those amounts excluded from their income so that they are not “taxed” on their income for monies that they have paid out for this purpose. This will help support the goal of self-sufficiency and

reduce attrition and evictions.

By allowing voucher-assisted households to deduct paid renter's insurance, which is required of them, from their income, it will help to align the voucher program with this requirement and support the goal of self-sufficiency and housing choice.

Changing the medical expense deduction to have an income exclusions reduces an administrative burden and helps qualifying households properly budget.

HUD' Safe Harbor in its MTW Operations Notice states that the following condition is required, "i. Agency must exempt elderly and disabled individuals from this rent determination policy." However, GPHA is seeking this Safe Harbor waiver in order to include all household types to benefit from this waiver activity, including elderly and disabled individuals and families.

(b) an impact analysis

Hardship policy submitted.

(c) a description of the hardship policy for the MTW activity, if applicable, and

Hardship policy submitted.

(d) 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.

No comments submitted.



Great Plains Housing Authority

Serving Dickey, Eddy, Foster, Logan, Sargent, Stutsman, and Wells Counties

Hardship policies: Activity: 1.w. Alternative Income Inclusions/Exclusion (HCV & MS)

Income exclusions

GPHA does not anticipate hardships under the proposed exclusions as it alleviates many issues on the income side and provides greater benefit to clients.

If a client would like an informal review to see the calculations, GPHA will provide that time and discussion.

Medical deduction flat percentage hardship

Participants can request a hardship under the MTW Medical Deduction implementation. Participants that experience a negative change or are required to pay more out of pocket during the implementation can request an extension to remain at the current Housing Assistance Payment levels until the next annual review.

Example for medical expense exclusion. GPHA would use the standard deduction under HUD regulations and set the medical expense review cut-off to the HOTMA standard of 10% of gross income. If a household presents medical expenses that would exceed the 10% threshold, GPHA would exclude 15% of their gross income.

The housing authority can provide documentation and refer the participant to economic assistance programs that might help in budgeting.

GPHA will include statements on letters explaining a hardship and how to apply. GPHA will create a standard form to assist participants in applying for a hardship.

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.

This waiver would benefit elderly and disabled families and individuals, including non-elderly persons with disabilities under the Mainstream 5- year program.

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Activity	Activity: 1.w. Alternative Income Inclusions/Exclusion (HCV & MS)
Fiscal Year	FY 2025
Program	Voucher Program (HCV) & Mainstream (MS5)
1. Impact on the agency's finances	<p>There will be an increase to HAP expenditures as clients will have an exclusion that was previously unavailable to them. GPHA does not know how many clients are eligible for the paid child support, paid spousal support, garnished social security, and renter's insurance exclusion. This is not an item that is tracked by agencies. Child support and spousal support are items that can be either formal agreements (court ordered) or informal agreements (notarized agreements). Clients will need to show payments being made.</p> <p>Work requirement should offset any costs. GPHA will also ease off administrative HAP costs to implement.</p> <p>Medical expense exclusion: GPHA anticipates his activity will increase HAP expenditures per year between HCV and Mainstream programs. GPHA has streamlined / alternating annual certifications for most fixed income households, and this will take two years to implement. However, this financial impact may change per HOTMA implementation.</p>
2. Impact on the affordability of housing costs for affected families	<p>This will increase affordability. Clients that paid these items were previously impacted as HUD used gross income and these clients were already at a loss.</p> <p>Many landlords are imposing a renter's liability policy or requiring insurance through private providers. This increases housing costs.</p> <p>This will improve many client's ability to afford housing costs as it locks in a standard amount. Several clients see large swings year to year in medical expenses and rental assistance.</p>
3. Impact on the agency's waitlist(s)	It is unknown how this will impact the waiting list with current HUD funding. GPHA may hold back added or replacing clients to implement this activity.
4. Impact on the agency's termination rate of families	<p>This should reduce termination rate. Households are being penalized for paying the child support, spousal support, and garnishment are setup for failure by not having enough financial backing to pay the rent or utilities.</p> <p>North Dakota Courts is upholding evictions based on renter's insurance and other fees. Assisting clients with these costs will reduce terminations, evictions, and at-</p>

	risk clients.
5. Impact on the agency's current utilization rate in the HCV program	GPHA anticipates the utilization rate to remain the same or dip. It is unknown how this will impact the utilization rate with current HUD funding.
6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency and/or housing choice	<p>These exclusions will allow for all three statutory goals to be met.</p> <p>This is cost effective by reducing down an enormous administrative burden, reducing error risks, and streamlining a calculation process for clients and housing staff.</p>
7. Impact on the agency's ability to meet MTW statutory requirements	It is unknown how this will impact the MTW statutory requirements with current HUD funding. However, GPHA will fluctuate other activities and funding sources to fully implement this item.
8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity	<p>There should be no hardship requests since the exclusions are new and not requiring formal agreements.</p> <p>Medical exclusions: GPHA anticipates 25-30 hardships under this change. GPHA staff and partnering agencies will assist clients in applying for other medical benefits.</p>
9. Impact on protected classes (and any disparate impact)	<p>This will have a positive impact the familial status to help support those receiving child support and spousal support. Allow a renter's insurance deduction will help all households under GPHA's program maintain affordability and reduce eviction risk.</p> <p>Medical exclusion: This activity is only eligible for HUD qualifying disabled and elderly households. GPHA is not changing the qualifications. GPHA does not foresee any impact on other protected classes.</p>