



Great Plains Housing Authority

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

Public Notice

Great Plains Housing Authority

FY2027 Proposed Annual Plan, Moving to Work Amendment, Resident Advisory, and Safe Harbor Waiver

There will be public hearings to review the FY2027 Great Plains Housing Authority's proposed Annual Plan, Moving to Work Amendment, and Safe Harbor Waiver. 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 three parts to GPHA's Plans – the Annual Plan, Moving to Work Amendment, and Safe Harbor Waiver.

The public comment period is open February 27, 2026, and written comments on the proposed documents will be accepted through February 27, 2026. A copy of the documents 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.

Resident Advisory Board. Great Plains Housing Authority will hold a Resident Advisory Board meeting on 10:00 AM on Thursday, February 26, 2026, on the proposed 2027 Annual PHA Plan, MTW Supplement, and Safe Harbor Waiver 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.

Annual Plan, MTW Supplement, Safe Harbor Waiver Hearing. Great Plains Housing Authority will hold a public hearing on 11:00 AM on Friday, February 27, 11:00 AM, on the proposed 2027 Annual PHA Plan, MTW Supplement, Safe Harbor Waiver 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.

Safe Harbor Waiver Hearing. Great Plains Housing Authority will hold a public hearing on 1:00 PM on Thursday, February 26, 2026, on the proposed 2027 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.

Mailing address: 300 2nd Ave NE – Suite 200, Jamestown, ND 58401

Toll free: 800-340-4537

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Email: office@greatplainsha.com

Fax: 701-252-7735

Locations: Carrington, Ellendale, Jamestown, New Rockford





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Annual Plan, Safe Harbor Waiver, Moving to Work Amendment, and supporting data will be available on <https://www.greatplainsha.com> by February 5, 2026.

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 be emailed to: director@greatplainsha.com.

Zoom: <https://us06web.zoom.us/j/7526175925?omn=88349821550>

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ND011 Great Plains Housing Authority Annual Plan | MTW Supplement February 27, 2025 – 11:00 AM

- Introduction & Public Hearing Information
- Presentation
- Public hearing for annual plan
- Public comments or questions
- Closing hearing for annual plan
- Public hearing for goals & implementation
- Public comments or questions
- Closing hearing for goals & implementation
- Public hearing for MTW Annual Plan Amendment
- Public comments or questions
- MTW Annual Plan Amendment hearing closed
- Public hearing for Safe Harbor Waivers
- Public comments or questions
- Closing Safe Harbor hearing
- Adjourn meetings

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ND011 Great Plains Housing Authority Annual Plan | MTW Supplement Resident Advisory Board Meeting February 26, 2025 – 10:00 AM

- Introduction & Public Hearing Information
- Presentation
- Public hearing for annual plan
- Public comments or questions
- Closing hearing for annual plan
- Public hearing for goals & implementation
- Public comments or questions
- Closing hearing for goals & implementation
- Public hearing for MTW Annual Plan Amendment
- Public comments or questions
- MTW Annual Plan Amendment hearing closed
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- Public comments or questions
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ND011 Great Plains Housing Authority Safe Harbor Waiver Hearing February 26, 2025 – 1:00 PM

- Introduction & Public Hearing Information
- Presentation
- Public hearing for Safe Harbor Waivers
- Public comments or questions
- Closing Safe Harbor hearing
- Adjourn meetings

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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: 2.a. Payment Standards – Small Area Fair Market Rents (HCV)
This applies to ND011 – Great Plains Housing Authority’s Housing Choice Voucher (HCV) and Mainstream Voucher (MS5) programs.

B) the specific safe harbor and its implementing regulation,

Safe Harbor 2A – Creating a single payment standard covering Great Plains Housing Authority jurisdiction.

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

Great Plains Housing Authority serves seven rural counties in North Dakota: Dickey, Eddy, Foster, Griggs, Logan, Sargent, Stutsman, and Wells. GPHA would create a single payment standard to cover all seven counties. This would help program participants search for an available unit without requiring different paper for each county. Landlords frequently cover multiple counties.

GPHA would use an average of the seven counties FMR posted for each size. Using an average has minimal interruption of payment standards.

This applies to the Housing Choice Voucher Program and Mainstream Voucher-5 program.

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.

Steady 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.

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

Great Plains Housing Authority serves seven rural counties in North Dakota. These counties often have different fair market rents creating a chaotic environment to help program participants find suitable housing in a region after being issued a voucher. Some participants search prefer searching in multiple counties, but that requires different Request for Tenancy documents with the proper payment standards. A single payment standard would allow participants to search areas where availability might be without needing to request additional documents from the housing authority.

In addition, there are numerous landlords that serve multiple counties in GPHA's jurisdiction. The landlords must track each voucher for the different amounts. The activity would reduce the headache for landlords.

GPHA believes a single payment standard would reduce staff confusion.

Rent reasonable comparisons are done in the jurisdiction to increase the number of comparable units and rent totals.

(b) an impact analysis

Impact analysis.

(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.



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Annual Plan & MTW Amendment changes
Changes from FY2026 documents

Additions:

Safe Harbor Waiver 2A: This waiver would allow GPHA to develop a single payment standard for all seven counties in its jurisdiction.

Safe Harbor Waiver 1W: Revises the previous waiver regarding Medical Deduction as Income Exemptions. Prior waiver sets the amount at 15% gross income as exemptions, and the new waiver allows up to 25%. This language allows GPHA Board to set the amount instead of conducting new hearings and HUD submissions.

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Public Notice

Great Plains Housing Authority
FY2027 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 that require HUD approval.

The public comment period is open Thursday, February 25, 2026, and written comments on the proposed Annual Plan will be accepted through Friday, February 26, 2026. 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 Thursday, February 26, 2026, on the proposed 2027 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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Comments may also be emailed to: director@greatplainsha.com.

Zoom: <https://us06web.zoom.us/j/7526175925?omn=86922494302>

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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 can request a review to use a higher amount between 15% and 25%.

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.

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Hardship policies: Safe Harbor Waiver - Activity: 2.a. Payment Standards – Small Area Fair Market Rents (HCV)

GPHA would create a single payment standard to cover all counties served. This would allow for more efficient processing, easier voucher use, and landlord understanding.

If a client experiences hardship because the initial payment standard is lower than the previous payment standard, GPHA will use the prior payment standard until a new payment standard exceeds that threshold.

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PHA Name : Great Plains Housing Authority

PHA Code : ND011

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 07/01/2026

PHA Program Type: Housing Choice Voucher (HCV) only

MTW Cohort Number: MTW Flexibility for Smaller PHAs II

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement 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 an income exclusion of a set percent of their gross income. GPHA would also provide income exclusions for paid child support and/or paid spousal support, paid renter's insurance, and social security garnishments. These activities will help provide greater cost efficiency to administer GPHA's voucher program and help secure housing for financially vulnerable clients.

GPHA will institute a minimum rent level of \$125 per month. Program participants will need to cover the minimum rent or file a waiver with supportive documentation. This incentivizes households to maintain income and reduces housing assistance.

The housing authority is requesting a Safe Harbor Waiver under 2A that would create a single payment standard for the counties served under GPHA's jurisdiction. Participants are often searching for housing in multiple areas that may have different standards. This will reduce the confusion and paperwork process. In addition, several landlords manage properties in various counties and a single payment standard would help reduce confusion and increase efficiency.

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.

C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).

1. Tenant Rent Policies	
s. Elimination of Deduction(s) (HCV & MS5)	Implemented
w. Alternative Income Inclusions/Exclusions (HCV & MS5)	Implemented
2. Payment Standards and Rent Reasonableness	
a: Small Area Fair Market Rents (HCV & MS5)	Plan to Implement in starting January 1, 2027
3. Reexaminations	
4. Landlord Leasing Incentives	
5. Housing Quality Standards (HQS)	
6. Short-Term Assistance	
7. Term-Limited Assistance	
8. Increase Elderly Age (PH & HCV)	
9. Project-Based Voucher Program Flexibilities	
10. Family Self-Sufficiency Program with MTW Flexibility	
11. MTW Self-Sufficiency Program	
12. Work Requirement	
b. Work Requirement (HCV)	Not implemented yet
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
14. Moving on Policy	
15. Acquisition without Prior HUD Approval (PH)	
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	
c. Housing Development Programs	Implemented

C. MTW Activities Plan that Great Plains Housing Authority Plans to Implement in the Submission Year or Is Currently Implementing

1.W. - Alternative Income Inclusions/Exclusions (HCV & MS5)
<p>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>This activity applies to HCV and Mainstream 5 vouchers. The goal is to streamline the medical deduction process by eliminating the medical expense deduction and replacing it with a set percentage income exclusion for qualifying households. This creates administrative efficiency and reduces the burden of determining qualifying expenses, auditing, and other items. In addition, the process makes it easier for clients to budget and plan by understanding the amount. Each year qualifying households may see large increases or decreases based on medical bills, this proposal reduces that. HOW IT WORKS: A qualifying elderly or disabled client would go through their review. If the person has paid medical expenses over the percentage threshold (10% with HOTMA), then the housing authority would exclude up to 25% of the person's income in lieu of expenses. If a person does not meet the medical threshold or have medical expenses, the person would receive the standard elderly / disabled deduction (adjusted with HOTMA).</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness</p>
<p>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>Increased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>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.</p> <p>GPHA will fully develop policies and procedures to implement this MTW activity, create new communication pieces, have board approval of policies, create hardship forms, and education components to clients. Full implementation would start July 1, 2025.</p>
<p>Does this MTW activity require a hardship policy?</p> <p>Yes. This document is attached.</p>
<p>Does the hardship policy apply to more than this MTW activity?</p> <p>No</p>
<p>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</p> <p>No</p>
<p>How many hardship requests have been received associated with this activity in the past year?</p> <p>No hardship were requested in the most recent fiscal year.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>Yes</p>
<p>What is the status of the Safe Harbor Waiver request?</p> <p>The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).</p>
<p>Does the MTW activity require an impact analysis?</p> <p>Yes. This document is attached.</p>
<p>Does the impact analysis apply to more than this MTW activity?</p> <p>No</p>
<p>Which deduction(s) will be eliminated, modified, or added?</p> <p>Other (please explain)</p>
<p>Other (please explain)</p> <p>Medical expense deductions will be modified. Changing the itemized medical expense deduction up to 25% income exclusion.</p>

1.w. - Alternative Income Inclusions/Exclusions (HCV & MS5)

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

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

These deductions reset the calculation from taking the gross income to income after the child/spousal support payments or social security garnishments. This allows the clients to show to landlords the income to continue leasing and ability to pay their bills. It also helps the corresponding households. The child/spousal support payments exclusion includes formal agreements such as court ordered and informal agreements that are notarized. The Social Security garnishment is something a SS statement will provide.

Clients who pay the renter's insurance or landlord liability policy can request that be excluded from the income. Many landlords require renter's insurance or the landlord liability policy. North Dakota Courts has imposed evictions solely based on unpaid insurance or non-compliance. The income exclusion will assist clients in having proper coverage, staying compliant with the lease, and maintaining housing assistance.

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

Cost effectiveness; Self-sufficiency; Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

GPHA will be creating the policies, forms, and communication items to implement this activity prior to implementation by July 1, 2025. GPHA will need to identify clients via their lease or reporting that they are indeed covering the costs with personal coverage or via the landlord. Paid Child or Spousal support will require additional Admin Plan policies and education. GPHA will create forms and add communication tools. This item is not one frequently requested through the office or tracked, so impacts are unknown.

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

Yes

What is the status of the Safe Harbor Waiver request?

The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).

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

Exclusion added - allowing PAID child support, PAID spousal support, and PAID renter's insurance or liability policies to be excluded from income.

2.a. – Payment Standards – Small Area Fair Market Rents (HCV & MS5)
<p>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>GPHA serves seven (7) rural counties in North Dakota that often have different Fair Market Rents (FMR). This results in confusion with program participants looking in multiple counties, landlords that serve multiple counties, and our agency in processing. A single payment standard would allow true consolidation and universal use while providing program relief to landlords and the housing authority.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness; Self-sufficiency; Housing choice</p>
<p>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>Increased expenditures are possible.</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households and future households.</p>
<p>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.</p> <p>GPHA would determine the best zip code to follow and research the published FMR for the year. Then adopt the percentage payment standard.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>Yes</p>
<p>What is the status of the Safe Harbor Waiver request?</p> <p>The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).</p>
<p>What inclusions or exclusions will be eliminated, modified, or added?</p> <p>Inclusion added to allow SAFMR.</p>
<p>Agency must implement an impact analysis.</p> <p>Submitted.</p>
<p>Agency must implement a hardship policy.</p> <p>Submitted.</p>

12.b. - Work Requirement (HCV & MS5)

Description:

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

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.

Following are the exemptions to the work requirement and MTW rent structure:

- 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.

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

Self-Sufficiency, Housing Choice, Cost Effectiveness

<p>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>Increased staffing costs to enforce work requirement and track clients required to participate. Decreased HAP expenditures and increased self-sufficiency</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households.</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>New admissions and currently assisted households</p>
<p>Does the MTW activity apply to all family types or only to selected family types?</p> <p>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.</p>
<p>Please select the family types subject to this MTW activity.</p>
<p>If Other Selected in Previous Question: Please describe this target population in the text box.</p>
<p>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p> <p>The MTW activity applies to all HCV tenant based units and project based vouchers.</p>
<p>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.</p> <p>Planning and notifications to tenants completed. GPHA paused implementation because of possible changes in HUD policies.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>Yes, it was approved</p>
<p>What is the status of the Safe Harbor Waiver request?</p> <p>Previously approved. GPHA has not fully implemented because it cannot submit files to PIC and receive accurate EIV and IVT reports.</p>
<p>Does the MTW activity require an impact analysis? yes</p>
<p>Does the impact analysis apply to more than this MTW activity? yes</p>
<p>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?</p> <p>Yes</p>
<p>Please describe the conditions for exemption.</p> <p>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.</p>
<p>What counts as 'work' under this the work requirement MTW activity?</p> <p>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.</p>
<p>How will the MTW agency monitor compliance with the work requirement MTW activity?</p> <p>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.</p>
<p>What supportive services are offered to support households to comply with the work requirement?</p> <p>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</p>
<p>How does the agency address noncompliance with the work requirement policy?</p> <p>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</p>
<p>How many households are currently subject to the policy?</p> <p>GPHA's analysis shows 126 households would be subject to the policy.</p>
<p>How many households in the most recently completed PHA fiscal year were sanctioned for non-compliance with the work requirement?</p> <p>None</p>

17.c. - Housing Development Programs (HCV & MS5)

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

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. Rural housing has numerous challenges, and non-traditional activities may help with development. GPHA may create a non-profit development entity to assist rural areas in developing housing or coordinating services.

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.

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.

This activity supports the goals to increase housing choices for low-income households and to leverage additional funds for affordable housing development.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

N/A

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

No

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

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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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 - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year

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

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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D.	Safe Harbor Waivers.
D.1	<p>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</p> <p>Yes, the Safe Harbor Waiver request(s) for 1W and 2A</p>

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) 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> <p>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year? No</p>
E.2	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>Does the MTW agency have any approved Agency-Specific Waivers? No</p>

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
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G.	MTW Statutory Requirements.	
G.1	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 must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
	80%-50% Area Median Income	
	49%-30% Area Median Income	
	Below 30% Area Median Income	
	Total Local, Non-Traditional Households	0

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

G.2	Establishing Reasonable Rent Policy.

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

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

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# 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?

G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.	
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.		
		Occupied Number of Local, Non-Traditional units by

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

H.	Public Comment
	Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.
	Please see attached for an additional public hearing held for Agency-Specific Waiver(s) and/or Safe Harbor Waiver(s)

I.	Evaluations.
	No known evaluations.



Great Plains Housing Authority

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

2027 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.

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

Significant Amendment/Modification

A Significant Amendment or Modification is defined as adding or removing a program that deviates

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Great Plains Housing Authority

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from the housing authority's mission statement.

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 include pay stubs, utility bills, lease, cell phone or phone bills, or a notarized letter demonstrating established residence.

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Great Plains Housing Authority

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- 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. PBV Mobility vouchers are awarded points for priority to assist over all vouchers except VAWA applicants.
 - 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. The point system sorts local applicants based on their score, lowest number of points first, then sort by date and time of application.
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.
 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

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

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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 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.

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- 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 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.

GOAL SIX: 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.

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- 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 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 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.

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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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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's board would set a percentage of the gross income from a qualifying household member's income, up to 25%. 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 percentage 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 set percentage 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, although HAP expenditures saw significant decreases by using a flat percentage.

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.