

Housing Authority of the City of Dothan (DHA)

Moving to Work (MTW) Supplement Plan

For Public Review, Board Approval, and Submission to HUD

A. PHA Information

PHA Name: Housing Authority of the City of Dothan (“DHA”)

PHA Code: AL007

BUDGET AUTHORITY: 1642 + 20 VASH = 1662

MTW Supplement for FY Beginning: 01/01/2024

PHA Program Type: Housing Choice Voucher (HCV) Program

MTW Cohort Number: #3

MTW Supplement Submission Type: Annual Submission

B.1. MTW Supplement Narrative

The Housing Authority of the City of Dothan (DHA) was granted flexibility and authority to develop policies in accordance with Moving to Work (MTW) for Expansion Agencies Operations Notice (Federal Register/ Vol. 85, NO. 168) FR/5994-N-05 outside the limitations of specific HUD regulations and provisions. The DHA was selected under the MTW Expansion, Cohort #3, Landlord Incentives.

The DHA is dedicated to developing and strengthening affordable housing opportunities that embrace best practices in a high-value organizational culture. The vision of DHA is to be committed to providing affordable housing services by implementing 21st-century technological approaches as a housing authority of the future. MTW is a demonstration program for PHAs that provides designated agencies the opportunity to design and test innovative, locally designed strategies that use federal dollars more efficiently, help residents find employment and become self-sufficient, and increase housing choices for low-income families.

The flexibilities allowed through the Moving-to-Work Program will enable the DHA to:

- Further encourage greater self-sufficiency by streamlining processes;
- Increase housing choices for families through enacting policies that encourage owner participation and increase units available to families within the local market; and
- Reduce administrative costs by reducing administrative burdens while increasing efficiency, resulting in increased cost-effectiveness.

Through the MTW initiatives and waiver requests, the DHA hopes to reduce administrative costs and increase its self-sufficiency effort. Through owner monetary incentives, the DHA hopes to further housing choices and options for participating families. The agency is uniquely positioned to work effectively with HUD in this endeavor, meet the three statutory goals, and work with HUD Policy Development & Research (PD&R) during this Landlord Incentives study.

In FY2023, the DHA team met with Abt Associates for their Moving to Work (MTW): Incentivizing Landlords in the Housing Choice Voucher Program study. DHA shared with Abt Associates researchers innovative practices that the agency has implemented and plans to use landlord monetary and nonmonetary incentives to meet the three MTW statutory objectives. DHA plans to continue meeting and speaking with Abt Associates during their research study and to monitor the agency’s landlord incentives’ impact on

housing choice, self-sufficiency, and cost-effectiveness relating to landlords' willingness to rent to HCV participants.

During the first three-quarters of FY2023, DHA has increased housing choices for families by enacting policies encouraging owner participation and increasing lease-up of families within the local market by adding 65 new units to the HCV program. During FY2023, DHA implemented the landlord incentives and distributed funds for the following monetary incentives:

- Security Deposit Payments: \$37,723.00
- Application Fee Payments: \$145.00
- Signing Bonus Payments: \$17,623.00
- Damage Payments: \$0.00
- Vacancy Loss Payments: \$0.00
- Renter's Insurance: \$0.00

As an MTW Landlord Incentives Cohort Expansion Agency, DHA's Landlord Liaison continued the Attract, Recruit, and Retain Landlord in the Wiregrass Area comprehensive marketing campaign. Some of the activities and landlord engagement events in FY2023 consisted of the following:

- Continued distributing the Invest. Profit. Repeat (IPR) Quarterly Newsletters
- 2nd Annual Real Estate Investor & Landlord Summit
- Landlord Orientations: Second Tuesday and Fourth Thursday each month
- Brunch & Learn Property Management Company Meetings
- Held 1st Annual Affordable Housing Symposium was held in November 2022 & 2nd Annual is scheduled for November 2023.
- Attended Dothan & Wiregrass Real Estate Associations and River Region Apartment Association Meetings, Luncheons, and Conferences.

For FY2024, DHA plans to meet the three MTW statutory objectives through the following activity:

- Reduce cost and achieve greater cost-effectiveness in federal expenditures by establishing an alternative reexamination schedule for DHA through a biennial reexamination scheduled for those families with fixed incomes. This will allow HCV Specialists more time to focus on encouraging greater economic self-sufficiency and aging-in-place of their caseloads.
- Increase housing choices for low-income families by offering a referral bonus in the amount of \$250 as a monetary incentive to owners referring a new owner to the DHA's HCV program, which results in the lease-up of an HCV participant.
- Increase housing choices for low-income families by offering property owners pre-qualifying inspections to simplify and streamline the inspection process for DHA and property owners.
- Reduce cost and achieve greater cost-effectiveness in federal expenditures and increase housing choices for low-income families by performing HQS inspections to simplify and streamline the inspection process for DHA's Project-Based Voucher (PBV) and Rental Assistance Demonstration (RAD) PBV units that it owns, manages, and/or controls. This will allow DHA to save money traditionally spent with third-party inspection companies.
- Reduce cost and achieve greater cost-effectiveness in federal expenditures, and increase housing choices for low-income families by offering an alternative inspection schedule. This will simplify and streamline the inspection process for DHA and property owners by inspecting units under contract at least once every three years for brand-new units built or units that had a substantial rehab within the last three (3) years.

- Reduce cost and achieve greater cost-effectiveness in federal expenditures, increase housing choices for low-income families, and help residents find employment and become self-sufficient by increasing DHA's PBV project cap within a project up to 100% to expand housing opportunities and help HCV participants move to high-opportunity areas.
- Reduce cost and achieve greater cost-effectiveness in federal expenditures, increase housing choices for low-income families and help residents find employment and become self-sufficient by eliminating the selection process in the award of PBVs to properties owned by DHA or its instrumentality to expand housing opportunities and help HCV participants move to high-opportunity areas.
- Reduce cost and achieve greater cost-effectiveness in federal expenditures, increase housing choices for low-income families, and help residents find employment and become self-sufficient by establishing an alternative competitive process in the award of PBVs that are owned by non-profit, for-profit housing entities to expand housing opportunities and help HCV participants move to high-opportunity areas.
- Reduce cost and achieve greater cost-effectiveness in federal expenditures, increase housing choices for low-income families, and help residents find employment and become self-sufficient by attaching and paying PBV assistance for shared housing units and/or manufactured housing to expand housing opportunities and help HCV participants move to high-opportunity areas.

C. MTW Waivers and Associated Activities

All are “Plan to Implement in the Submission Year”

C.3	Reexaminations
Activity 3.b.	Alternative Reexamination Schedule for Households (HCV)
C.4	Landlord Leasing Incentives
Activity 4.c.	Other Landlord Incentives (HCV)
C.5	Housing Quality Standards (HQS) Inspections
Activity 5.a.	Pre-Qualifying Unit Inspections (HCV)
Activity 5.c.	Third-Party Requirement (HCV)
Activity 5.d.	Alternative Inspection Schedule (HCV)
C.9	Project-Based Voucher Program Flexibilities (PBV)
Activity 9.b.	Increase PBV Project Cap (HCV)
Activity 9.c.	Elimination of PBV Selection Process for PHA-owned Projects without Improvement, Development, or Replacement (HCV)
Activity 9.d.	Alternative PBV Selection Process
Activity 9.e.	Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)

Activity 3.b. – Alternative Reexamination Schedule for Households

Impact Analysis - Activity 3.b. – Alternative Reexamination Schedule for Households

Activity 3.b.		FY2024
		HCV
1.	Impact on the agency’s finances	The PHA will establish a biennial reexamination schedule for those heads of households with fixed incomes. The PHA will allow one interim adjustment per year at the request of the household, if the household gross income has decreased by 10% or more.
2.	Impact on the affordability of housing costs for affected families	None
3.	Impact on the agency’s waitlist(s)	None
4.	Impact on the agency’s termination rate of families	None
5.	Impact on the agency’s current utilization rate in the HCV program	None
6.	Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency and/or housing choice	Cost-effectiveness.
7.	Impact on the agency’s ability to meet MTW statutory requirements	The administrative costs will decrease since fewer re-exams will be required to be processed annually.
8.	Impact on the rate of hardship requests and the number granted and denied as a result of this activity	This is the initial year of implementation. The DHA does not expect any hardship.
9.	Impact on protected classes (and any disparate impact)	This activity will have no disparate impact on protected classes.

3.b. – Alternative Reexamination Schedule – Specific Questions		
What is the recert schedule?	Once every two years	
How many interim recertifications per year may a household request?	One – within a calendar year at the request of the household, if the household gross income has decreased by 10% or more.	
How will PHA address changes in family circumstances	Changes in the household composition will be processed only at biennial reexamination unless the family reports a household addition that impacts HQS space requirements.	

Activity 4.c. – Other Landlord Incentives- Referral Fee

4.c. – Other Landlord Incentives- Referral Fee		
Narrative	<i>Description:</i> To incentivize new owners to join the HCV program, DHA will provide a Referral Fee payment, as defined in an agency’s Administrative Plan to current owners who refer new owners to the DHA. As a result, those new owners lease up HCV participants and enter into a HAP contract with DHA. DHA will update its Administrative Plan to reflect the Referral Fee payment and owner incentive item.	Applies to all units
MTW Statutory Objective	Housing Choice	
Cost Implications	Increase expenditure	
Different policy by household status/family types/sites	The MTW activity applies to all assisted households	
Safe Harbor Waiver needed?	No	
Hardship Policy required?	No	
Does Hardship Apply to more than this activity	[skip]	
Has the agency modified the hardship policy since the last submission	[skip]	
Impact Analysis required?	No	
Impact Analysis apply to more than this MTW activity	[skip]	
What has been accomplished or changed during the implementation	N/A	

4.c. – Other Landlord Incentives – Specific Questions	
Does this policy apply to certain types of units or to all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?)	All HCV Units
What is the maximum payment that can be made to a landlord under this policy?	Payments made to the owner will be equal to but no more than \$250.00.
How many payments were issued under this policy in the most recently completed PHA fiscal year	\$0
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?	\$0

Activity 5.a. – Pre-Qualifying Unit Inspections (HCV)

5.a. – Pre-Qualifying Unit Inspections (HCV)		
Narrative	<i>Description:</i> DHA will allow pre-qualifying inspections. The pre-inspection must have been conducted within 90 days of the HCV participant occupying the unit. DHA will also conduct an interim inspection at the request of the family or landlord.	Applies to all units
MTW Statutory Objective	Housing Choice	
Cost Implications	Increase expenditures.	
Different policy by household status/family types/sites	The MTW activity applies to all assisted households	
Safe Harbor Waiver needed?	Yes	
Hardship Policy required?	No	
Does Hardship Apply to more than this activity	[skip]	
Has the agency modified the hardship policy since the last submission	[skip]	
Impact Analysis required?	No	
Impact Analysis apply to more than this MTW activity	[skip]	
What has been accomplished or changed during the implementation	N/A	

Activity 5.c. – Third-Party Inspections

5.c. – Third-Party Inspections		
Narrative	<i>Description:</i> DHA is authorized to perform HQS inspections on Project-Based Voucher (PBV) and Rental Assistance Demonstration (RAD) PBV units that it owns, manages, and/or controls, including properties under its nonprofit affiliate, Our Community, Inc. (OCI). DHA will also conduct an interim inspection at the request of the family or landlord. DHA will also create a quality control (QC) method to ensure an objective analysis.	Applies to all units
MTW Statutory Objective	Cost-effectiveness, Housing Choice	DHA quality control (QC) method will reflect SEMAP Indicator 5 – HQS Quality Control Inspections, Indicator 6 – HQS Enforcement, and Indicator 11 – Pre-Contract HQS Inspections. This will be monitored by the Director of Compliance and Policy, the HCV Manager, & the Chief Housing Officer.
Cost Implications	Decreased expenditures.	
Different policy by household status/family types/sites	The MTW activity applies to all assisted households	
Safe Harbor Waiver needed?	Yes	
Hardship Policy required?	No	
Does Hardship Apply to more than this activity	[skip]	
Has the agency modified the hardship policy since the last submission	[skip]	
Impact Analysis required?	No	
Impact Analysis apply to more than this MTW activity	[skip]	
What has been accomplished or changed during the implementation	N/A	

Activity 5.d. – Alternative Inspection Schedule (HCV)

5.d. – Alternative Inspection Schedule		
Narrative	<i>Description:</i> DHA will inspect units under contract at least once every three years, applying minimum Housing Quality Standards (HQS) for brand-new units built or units that had a substantial rehab within the last three (3) years. DHA will also conduct an interim inspection at the request of the family or landlord.	Applies to all units
MTW Statutory Objective	Cost-effectiveness, Housing Choice	
Cost Implications	Decreased expenditures.	
Different policy by household status/family types/sites	The MTW activity applies to all assisted households	
Safe Harbor Waiver needed?	Yes	
Hardship Policy required?	No	
Does Hardship Apply to more than this activity	[skip]	
Has the agency modified the hardship policy since the last submission	[skip]	
Impact Analysis required?	No	
Impact Analysis apply to more than this MTW activity	[skip]	
What has been accomplished or changed during the implementation	N/A	

Activity 9.b. – Increase PBV Project Cap

9.b. – Increase PBV Project Cap		
Narrative	<i>Description:</i> DHA will increase its PBV Project Cap within a project up to 100%.	Applies to all units
MTW Statutory Objective	Cost-effectiveness, Housing Choice, Self-Sufficiency	
Cost Implications	Decreased expenditures.	
Different policy by household status/family types/sites	The MTW activity applies to all assisted households	
MTW Statutory Objective	Cost-effectiveness, Housing Choice, Self-Sufficiency	
Cost Implications	Neutral	
Different policy by household status/family types/sites	The MTW activity applies to all assisted households	
Safe Harbor Waiver needed?	Yes	
Hardship Policy required?	No	
Does Hardship Apply to more than this activity	[skip]	
Has the agency modified the hardship policy since the last submission	[skip]	
Impact Analysis required?	No	
Impact Analysis apply to more than this MTW activity	[skip]	
What has been accomplished or changed during the implementation	N/A	

Activity 9.c. – Elimination of PBV Selection Process for PHA-owned Projects without Improvement, Development, or Replacement

9.c. – Elimination of PBV Selection Process for PHA-owned Projects without Improvement, Development, or Replacement		
Narrative	<i>Description:</i> DHA will eliminate the selection process in the award of PBVs to properties owned by the agency, including properties under its nonprofit affiliate, Our Community, Inc. (OCI), that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site. DHA will conduct a subsidy layering review and meet site selection requirements and or its nonprofit instrumentality, OCI.	Applies to all units
MTW Statutory Objective	Cost-effectiveness, Housing Choice, Self-Sufficiency	
Cost Implications	Neutral	
Different policy by household status/family types/sites	The MTW activity applies to all assisted households	
Safe Harbor Waiver needed?	Yes	
Hardship Policy required?	No	
Does Hardship Apply to more than this activity	[skip]	
Has the agency modified the hardship policy since the last submission	[skip]	
Impact Analysis required?	No	
Impact Analysis apply to more than this MTW activity	[skip]	
What has been accomplished or changed during the implementation	N/A	

Activity 9.d. – Alternative PBV Unit Selection Process

9.c. – Alternative PBV Unit Selection Process		
Narrative	<i>Description:</i> DHA will establish an alternative competitive process in the award of PBVs that are owned by non-profit, for-profit housing entities or by the agency that are not public housing. DHA will establish criteria for awarding PBVs for entities that are interested in a joint venture partnership with its nonprofit instrumentality, Our Community Inc. This selection criteria will also include DHA choosing third-party property management companies that meet the capacity threshold for managing PBV affordable housing development.	Applies to all units
MTW Statutory Objective	Cost-effectiveness, Housing Choice, Self-Sufficiency	
Cost Implications	Neutral	
Different policy by household status/family types/sites	The MTW activity applies to all assisted households	
Safe Harbor Waiver needed?	Yes	
Hardship Policy required?	No	
Does Hardship Apply to more than this activity	[skip]	
Has the agency modified the hardship policy since the last submission	[skip]	
Impact Analysis required?	No	
Impact Analysis apply to more than this MTW activity	[skip]	
What has been accomplished or changed during the implementation	N/A	

Activity 9.e. – Alternative PBV Unit Types (Shared Housing and Manufactured Housing)

9.e. – Alternative PBV Unit Types (Shared Housing and Manufactured Housing)		
Narrative	<i>Description:</i> DHA will attach and pay PBV assistance for shared housing units and/or manufactured housing. DHA will comply with the deconcentration and desegregation requirements. The units will comply with HQS and a subsidy layering review will be conducted. Also, the shared housing units will not be owner occupied.	Applies to all units
MTW Statutory Objective	Cost-effectiveness, Housing Choice, Self-Sufficiency	
Cost Implications	Neutral	
Different policy by household status/family types/sites	The MTW activity applies to all assisted households	
Safe Harbor Waiver needed?	Yes	
Hardship Policy required?	No	
Does Hardship Apply to more than this activity	[skip]	
Has the agency modified the hardship policy since the last submission	[skip]	
Impact Analysis required?	No	
Impact Analysis apply to more than this MTW activity	[skip]	
What has been accomplished or changed during the implementation	N/A	