



Foothills Regional Housing

Moving to Work Plan and Supplement

For public comment

January 12, 2023



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What is Moving to Work?

As the population of the greater Denver area and Jefferson County has grown, affordable housing is becoming more difficult to obtain for working families, seniors and people experiencing disabilities, and other low-income individuals and households. The rental market in Jefferson County continues to tighten and median rents have risen 59% since 2010¹. Many working people face high housing cost burdens or long commutes to work. At the same time, many seniors who want to age in place cannot afford to rent in their current neighborhood.

Foothills Regional Housing (FRH) joined the Moving to Work (MTW) demonstration program in 2022 under the ‘landlord incentive’ cohort to help the agency address the affordable housing challenges in Jefferson County. Through its participation in Moving to Work, FRH seeks to increase housing choice and promote self-sufficiency for its Housing Choice Voucher (HCV) families living in Jefferson County.

The Moving to Work demonstration provides participating public housing authorities, like FRH, with two key flexibilities to meet local housing needs. First, agencies may combine various federal funding streams into a single, flexible account. Second, agencies may implement policies that modify the 1937 Housing Act and subsequent amendments. These policies—known as MTW ‘activities’—must fulfill at least one of MTW’s statutory objectives, which include:

- Reduce costs and achieve greater cost-effectiveness in federal expenditures.
- Give incentives to families with children to obtain employment and become economically self-sufficient.
- Increase housing choices for low-income families.

Importantly, agencies that are participating in MTW do not receive any additional federal funding. As a result of that, they must constantly balance any activities that either increase expenditures or reduce revenues with other activities that decrease expenditures or increase revenues.

FRH and Moving to Work

Through its participation in Moving to Work, FRH will seek to address the barriers that its Housing Choice Voucher (HCV, commonly known as ‘Section 8’) families face in accessing affordable housing. In particular, FRH will seek to expand the number of housing options available to HCV families in ‘high opportunity neighborhoods’ with low crime, good schools, and access to jobs. Providing residents with more housing choices will increase self-sufficiency for HCV families by allowing them to live closer to

¹ American Community Survey (1 year) Median Gross Rent, 2019, 2010.

well-paying jobs that can help them provide for their families and build wealth. FRH will also seek to implement Moving to Work activities that allow it to deliver services in more cost-effective ways, which will allow FRH to fund its landlord incentives.

In addition to the MTW statutory objectives, FRH’s goals for Moving to Work participation include:

- Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods
- Reduce voucher holders’ search times for housing
- Deliver services in more cost-effective ways
- Help families with children become economically self-sufficient

MTW Activities to be Implemented in the Coming Year

This document describes the MTW activities that FRH will seek to implement in the coming year (2023). FRH will continue to implement these activities in future years unless it eliminates or modifies them in a future MTW plan or an MTW plan addendum. In subsequent years, FRH may seek to implement additional activities that will further address the goals of its MTW participation as outlined above.

We have summarized the MTW activities that FRH intends to implement in the table below. As you can see, most of these activities concern the MTW statutory objective of increasing housing options for low-income families. Relatively fewer activities seek to address the other two MTW statutory objectives.

Exhibit 1: Proposed MTW activities

#	Description	Achieve cost efficiencies	Support self-sufficiency	Increase housing options
2023-1	Payment Standards – Fair Market Rents			X
2023-2	Self-certification of assets	X	X	
2023-3	HCV Leasing Initiative			X
2023-4	Waiver of Mandatory Initial Inspection	X		X
2023-5	Pre-Qualifying Unit Inspections			X
2023-6	Alternative Inspection Schedule	X		X
2023-7	Increase PBV Program Cap			X
2023-8	Increase PBV Project Cap			X
2023-9	Elimination of PBV Selection Process for PHA-owned Projects without Improvement, Development, or Replacement	X		X
2023-10	Alternative PBV Selection Process			X
2023-11	Increase PBV HAP Contract Length			X
2023-12	Increase PBV Rent to Owner			X
2023-13	Service Provision (local, non-traditional)		X	
2023-14	Housing Development Programs (local, non-traditional)			X

Activity 2023-1: Payment Standards – Fair Market Rents

Description of Activity: FRH will increase its payment standards to 120% of Fair Market Rents (FMR). The agency will continue to use its rent reasonableness process to determine rent to owner for individual units.

This activity contributes to FRH’s Moving to Work goals of:

- Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods
- Reduce voucher holders’ search times

This activity is labeled as 2.b in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

Activity details:

- **Which of the MTW Statutory Objectives does this MTW activity serve:** Increasing housing options for low-income families
- **What are the cost implications of this MTW activity?** Increase expenditures
- **Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households:** Applies to all households
- **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
- **Does the MTW activity apply to all family types or only to selected family types:** The MTW activity applies to all family types
- **Please select the family types subject to this MTW activity:** N/A
- **Does the MTW activity apply to all public housing developments?** N/A
- **Which developments participate in the MTW activity?** N/A
- **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 activity require a hardship policy?** Yes
- **Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?** No
- **Does the MTW activity require an impact analysis?** Yes

Activity 2023-2: Self-certification of assets

Description of Activity: At re-examination, FRH will allow clients to self-certify assets up to \$50,000. This activity will minimize staff burden during reexaminations while also encouraging FRH clients to accumulate assets without worrying that they will increase their rent

This activity contributes to FRH's Moving to Work goals of:

- Deliver services in more cost-effective ways
- Help families with children become economically self-sufficient

This activity is labeled as 3.d in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

Activity details:

- **Which of the MTW Statutory Objectives does this MTW activity serve:** Reduce cost and achieve greater cost effectiveness in federal expenditures; Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient
- **What are the cost implications of this MTW activity?** Cost-neutral
- **Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households:** Applies to all households
- **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
- **Does the MTW activity apply to all family types or only to selected family types:** The MTW activity applies to all family types
- **Please select the family types subject to this MTW activity:** N/A
- **Does the MTW activity apply to all public housing developments?** N/A
- **Which developments participate in the MTW activity?** N/A
- **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 activity require a hardship policy?** No
- **Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?** No
- **Does the MTW activity require an impact analysis?** No

Activity 2023-3: HCV Leasing Initiative

Description of Activity: FRH will establish a policy to reimburse landlords for tenant damages following move out. The maximum amount of claims that a landlord may request is limited to two months of contract rent and the landlord must have exhausted the tenants' security deposit before they can request funds from FRH. Landlords must submit proof of damages and their expenses and that these expenses exceed the amount of the security deposit. The payment will be made when the next HAP contract is executed between the owner and FRH.

In addition, FRH will establish other incentives to encourage landlords to participate in the HCV program. These may include a sign-up bonus for landlords who have not previously rented to an FRH voucher holder for a certain number of years as well as a continuation bonus for landlords who renew the lease of a voucher holder.

This activity contributes to FRH's Moving to Work goals of:

- Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods
- Reduce voucher holders' search times

This activity is labeled as 4.b and 4.c in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

4.b Activity details:

- **Which of the MTW Statutory Objectives does this MTW activity serve:** Increasing housing options for low-income families
- **What are the cost implications of this MTW activity?** Increase expenditures
- **Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households:** Applies to all households
- **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
- **Does the MTW activity apply to all family types or only to selected family types:** The MTW activity applies to all family types
- **Please select the family types subject to this MTW activity:** N/A
- **Does the MTW activity apply to all public housing developments?** N/A
- **Which developments participate in the MTW activity?** N/A
- **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 activity require a hardship policy?** No
- **Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?** No
- **Does the MTW activity require an impact analysis?** No

Activity 2023-4: Waiver of Mandatory Initial Inspection

Description of Activity: FRH will waive the requirement for an initial inspection for units that meet any of the following criteria:

- The unit is less than five years old (as determined by the certificate of occupancy)
- The unit passed an HQS inspection within the previous three years

Even when an initial inspection is waived under this activity, the voucher participant or landlord may request an interim inspection at any time. Following the waived initial inspection, the unit will then be inspected on FRH's Alternative Inspection Schedule (see Activity 2023-6 for details).

This activity contributes to FRH's Moving to Work goals of:

- Deliver services in more cost-effective ways
- Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods
- Reduce voucher holders' search times

This activity is labeled as 4.1 in the Request for Applications to the Landlord Incentive Cohort document and is a cohort-specific waiver. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

Activity details:

- **Which of the MTW Statutory Objectives does this MTW activity serve:** Reduce cost and achieve greater cost effectiveness in federal expenditures; Increasing housing options for low-income families
- **What are the cost implications of this MTW activity?** Decrease expenditures
- **Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households:** Applies to all households
- **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
- **Does the MTW activity apply to all family types or only to selected family types:** The MTW activity applies to all family types
- **Please select the family types subject to this MTW activity:** N/A
- **Does the MTW activity apply to all public housing developments?** N/A
- **Which developments participate in the MTW activity?** N/A
- **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 activity require a hardship policy?** No
- **Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?** No
- **Does the MTW activity require an impact analysis?** No

Activity 2023-5: Pre-Qualifying Unit Inspections

Description of Activity: When requested by the property owner or manager, FRH may conduct a pre-qualifying unit inspection up to 90 days prior to the voucher participant occupying a unit. This pre-qualifying inspection will streamline the lease-up process for voucher participants, as the inspection will have already been conducted prior to the RFTA being completed. It will also encourage more landlords to participate in the voucher program as it will reduce the lease-up time for voucher holders, thus allowing landlords to receive their first HAP payment earlier.

This activity contributes to FRH's Moving to Work goals of:

- Deliver services in more cost-effective ways
- Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods
- Reduce voucher holders' search times

This activity is labeled as 5.a in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

Activity details:

- **Which of the MTW Statutory Objectives does this MTW activity serve:** Reduce cost and achieve greater cost effectiveness in federal expenditures; Increasing housing options for low-income families
- **What are the cost implications of this MTW activity?** Cost neutral
- **Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households:** Applies to all households
- **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
- **Does the MTW activity apply to all family types or only to selected family types:** The MTW activity applies to all family types
- **Please select the family types subject to this MTW activity:** N/A
- **Does the MTW activity apply to all public housing developments?** N/A
- **Which developments participate in the MTW activity?** N/A
- **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 activity require a hardship policy?** No
- **Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?** No
- **Does the MTW activity require an impact analysis?** No

Activity 2023-6: Alternative Inspection Schedule

Description of Activity: FRH will establish a policy to reduce the frequency with which it conducts Housing Quality Standards (HQS) inspections to once every three years following the initial inspection. Voucher participants may still request an interim inspection when they believe the unit is not meeting HUD housing quality standards between the regularly scheduled 3-year inspections.

This activity contributes to FRH's Moving to Work goals of:

- Deliver services in more cost-effective ways
- Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods
- Reduce voucher holders' search times

This activity is labeled as 5.d in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

Activity details:

- **Which of the MTW Statutory Objectives does this MTW activity serve:** Reduce cost and achieve greater cost effectiveness in federal expenditures; Increasing housing options for low-income families
- **What are the cost implications of this MTW activity?** Decrease expenditures
- **Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households:** Applies to all households
- **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
- **Does the MTW activity apply to all family types or only to selected family types:** The MTW activity applies to all family types
- **Please select the family types subject to this MTW activity:** N/A
- **Does the MTW activity apply to all public housing developments?** N/A
- **Which developments participate in the MTW activity?** N/A
- **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 activity require a hardship policy?** No
- **Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?** No
- **Does the MTW activity require an impact analysis?** No

Activity 2023-7: Increase PBV Program Cap

Description of Activity: FRH intends to increase its project-based voucher (PBV) cap to 50 percent of its total authorized voucher units or annual voucher budget authority, whichever is lower. By project-basing more vouchers, FRH can strategically locate PBV units in high-opportunity neighborhoods in Jefferson County. PBV units can also help to reduce voucher holders' search times by providing more units in Jefferson County that rent to voucher holders.

This activity contributes to FRH's Moving to Work goals of:

- Increasing the number of units available to voucher holders in Jefferson County
- Increasing the number of units available to voucher holders in high-opportunity neighborhoods
- Reducing voucher holders' search times

This activity is labeled as 9.a in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

Activity details:

- **Which of the MTW Statutory Objectives does this MTW activity serve:** Increasing housing options for low-income families
- **What are the cost implications of this MTW activity?** Cost-neutral
- **Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households:** Applies to all households
- **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
- **Does the MTW activity apply to all family types or only to selected family types:** The MTW activity applies to all family types
- **Please select the family types subject to this MTW activity:** N/A
- **Does the MTW activity apply to all public housing developments?** N/A
- **Which developments participate in the MTW activity?** N/A
- **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 activity require a hardship policy?** No
- **Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?** No
- **Does the MTW activity require an impact analysis?** No

Activity 2023-8: Increase PBV Project Cap

Description of Activity: FRH intends to increase the allowable project-based voucher cap within a project up to 100% of units. This activity will allow FRH to strategically locate PBVs in projects in high-opportunity neighborhoods in Jefferson County. This activity will complement Activity 9.a above by increasing the availability of units available to FRH voucher holders, thus decreasing average search times for housing.

This activity contributes to FRH's Moving to Work goals of:

- Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods

This activity is labeled as 9.b in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

Activity details:

- **Which of the MTW Statutory Objectives does this MTW activity serve:** Increasing housing options for low-income families
- **What are the cost implications of this MTW activity?** Cost-neutral
- **Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households:** Applies to all households
- **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
- **Does the MTW activity apply to all family types or only to selected family types:** The MTW activity applies to all family types
- **Please select the family types subject to this MTW activity:** N/A
- **Does the MTW activity apply to all public housing developments?** N/A
- **Which developments participate in the MTW activity?** N/A
- **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 activity require a hardship policy?** No
- **Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?** No
- **Does the MTW activity require an impact analysis?** No

Activity 2023-9: Elimination of PBV Selection Process for PHA-owned Projects without Improvement, Development, or Replacement

Description of Activity: FRH will eliminate the selection process in the award of project-based vouchers (PBVs) to properties owned by FRH.

This activity contributes to FRH's Moving to Work goals of:

- Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods

This activity is labeled as 9.c in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

Activity details:

- **Which of the MTW Statutory Objectives does this MTW activity serve:** Increasing housing options for low-income families
- **What are the cost implications of this MTW activity?** Reduce expenditures
- **Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households:** Applies to all households
- **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
- **Does the MTW activity apply to all family types or only to selected family types:** The MTW activity applies to all family types
- **Please select the family types subject to this MTW activity:** N/A
- **Does the MTW activity apply to all public housing developments?** N/A
- **Which developments participate in the MTW activity?** N/A
- **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 activity require a hardship policy?** No
- **Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?** No
- **Does the MTW activity require an impact analysis?** No

Activity 2023-10: Alternative PBV Selection Process

Description of Activity: FRH will establish an alternative competitive process in the award of project-based vouchers (PBVs) for properties that are owned by non-profit or for-profit housing entities.

This activity contributes to FRH's Moving to Work goals of:

- Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods

This activity is labeled as 9.d in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

Activity details:

- **Which of the MTW Statutory Objectives does this MTW activity serve:** Increasing housing options for low-income families
- **What are the cost implications of this MTW activity?** Cost-neutral
- **Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households:** Applies to all households
- **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
- **Does the MTW activity apply to all family types or only to selected family types:** The MTW activity applies to all family types
- **Please select the family types subject to this MTW activity:** N/A
- **Does the MTW activity apply to all public housing developments?** N/A
- **Which developments participate in the MTW activity?** N/A
- **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 activity require a hardship policy?** No
- **Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?** No
- **Does the MTW activity require an impact analysis?** No

Activity 2023-11: Increase PBV HAP Contract Length

Description of Activity: FRH may, at its discretion, increase the term length of PBV contracts up to 50 years. In particular, FRH will seek to extend the terms of PBV contracts for those units in high-opportunity neighborhoods in Jefferson County. Extending the term length of the PBV contract will ensure that voucher holders in Jefferson County have access to units in high-opportunity neighborhoods for decades to come.

This activity contributes to FRH's Moving to Work goals of:

- Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods

This activity is labeled as 9.f in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

Activity details:

- **Which of the MTW Statutory Objectives does this MTW activity serve:** Increasing housing options for low-income families
- **What are the cost implications of this MTW activity?** Cost-neutral
- **Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households:** Applies to all households
- **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
- **Does the MTW activity apply to all family types or only to selected family types:** The MTW activity applies to all family types
- **Please select the family types subject to this MTW activity:** N/A
- **Does the MTW activity apply to all public housing developments?** N/A
- **Which developments participate in the MTW activity?** N/A
- **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 activity require a hardship policy?** No
- **Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?** No
- **Does the MTW activity require an impact analysis?** No

Activity 2023-12: Increase PBV Rent to Owner

Description of Activity: FRH will use its rent reasonableness policy to determine the initial and re-determined rent to owner for PBV units. This is the same process that FRH uses to determine rent reasonableness for private-market landlords who rent to tenant-based voucher holders. FRH will cap PBV rent to owner at 120% of Fair Market Rent (FMR). Under this activity, FRH will not reduce the rent paid to a PBV owner, thus eliminating the potential for any undue hardships on FRH clients.

This activity contributes to FRH's Moving to Work goals of:

- Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods

This activity is labeled as 9.g in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

Activity details:

- **Which of the MTW Statutory Objectives does this MTW activity serve:** Increasing housing options for low-income families
- **What are the cost implications of this MTW activity?** Increase expenditures
- **Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households:** Applies to all households
- **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
- **Does the MTW activity apply to all family types or only to selected family types:** The MTW activity applies to all family types
- **Please select the family types subject to this MTW activity:** N/A
- **Does the MTW activity apply to all public housing developments?** N/A
- **Which developments participate in the MTW activity?** N/A
- **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 activity require a hardship policy?** Yes
- **Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?** No
- **Does the MTW activity require an impact analysis?** Yes

Activity 2023-13: Service Provision (local, non-traditional)

Description of Activity: FRH will use its MTW fiscal fungibility to develop new and innovative supportive services for its HCV program participants.

This activity contributes to FRH's Moving to Work goals of:

- Help families with children become economically self-sufficient

This activity is labeled as 17.b in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

Activity details:

- **Which of the MTW Statutory Objectives does this MTW activity serve:** Help families with children become economically self-sufficient
- **What are the cost implications of this MTW activity?** Increase expenditures
- **Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households:** Applies to all households
- **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
- **Does the MTW activity apply to all family types or only to selected family types:** The MTW activity applies to all family types
- **Please select the family types subject to this MTW activity:** N/A
- **Does the MTW activity apply to all public housing developments?** N/A
- **Which developments participate in the MTW activity?** N/A
- **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 activity require a hardship policy?** No
- **Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?** No
- **Does the MTW activity require an impact analysis?** No

Activity 2023-14: Housing Development Programs (local, non-traditional)

Description of Activity: FRH will use its MTW fiscal fungibility to acquire, renovate, and/or build affordable units for low-income families that are not public housing units.

This activity contributes to FRH's Moving to Work goals of:

- Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods

This activity is labeled as 17c in the MTW Operations Notice. FRH will not be pursuing a Safe Harbor waiver for any portions of this activity.

Activity details:

- **Which of the MTW Statutory Objectives does this MTW activity serve:** Increase the number of housing units available to voucher households, especially in high-opportunity neighborhoods
- **What are the cost implications of this MTW activity?** Increase expenditures
- **Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households:** Applies to all households
- **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
- **Does the MTW activity apply to all family types or only to selected family types:** The MTW activity applies to all family types
- **Please select the family types subject to this MTW activity:** N/A
- **Does the MTW activity apply to all public housing developments?** N/A
- **Which developments participate in the MTW activity?** N/A
- **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 activity require a hardship policy?** No
- **Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?** No
- **Does the MTW activity require an impact analysis?** No