



Highlights of the First Amendment to the Charlotte Housing Authority's Fiscal Year 2015 – 2016 Moving Forward Annual Plan

These activities will go out for public review and comment May 4th - June 2, 2015. The full write up of the activities will be posted at the Main Branch of the Public Library, Old City Hall, and CHA's Administrative office and on the agency website. Any person who wishes to provide comments to the Board of Commissioners regarding the activities is invited to speak at a Public Hearing on May 19, 2015 at 5 pm at 400 East Blvd. Comments received before, during and after the Public Hearing will be provided to both the Board of Commissioners and Moving To Work staff at the U.S. Department of Housing and Urban Development and taken into consideration for the final activity submitted to HUD for approval.

The FY2016 Moving Forward Annual Plan covers the time period for April 1, 2015 – December 31, 2016. The following items, if approved, will be an amendment to the FY2016 annual plan. The approved amendment will become Appendix S in the Appendices section of the FY2016 Moving Forward Annual Plan after HUD approval. All participants and/or housing agencies impacted by the proposed activities will be notified 30 days in advance of effective date.

The following activities are being proposed for implementation in FY2016 at the Charlotte Housing Authority to reduce costs and achieve greater cost-effectiveness in federal housing expenditures:

1) Limit Transfers to 18 Months

CHA will approve elective move transfers only if the participant has lived in the current unit for a minimum of eighteen (18) consecutive months unless the situation involves a mandatory or permissible move.

Mandatory:

- Abatement
- Breach of contract by owner
- Transfer of ownership where new owner is not participating in the HCV program
- Notice of Pending Foreclosure
- Underhoused
- Natural disasters that make the unit uninhabitable
- Decrease in the Payment Standard

Permissible:

- Domestic Violence
- Reasonable Accommodations
- Health or safety of a family member (e.g. lead-based paint hazards, domestic violence, and witness protection programs), or to address an emergency situation over which a family has no control.

Other requests shall be processed on a case-by-case basis at the discretion of the Chief Executive Officer, or his/her designee. Third party documentation will be required for all requests inside of the 18 month period. Owner agreement to termination may be applicable in some situations. This activity will apply to all tenant based voucher holders and port-ins.

2) Work Requirement for New Incoming Portability Families

CHA would like to establish an initiative requiring all new incoming portability families (“port-ins”) to either be working or have a verifiable employment offer when porting into Mecklenburg County. This policy will not apply to elderly, disabled or domestic violence households.

Prior to porting into CHA’s HCV program, port-ins must be employed within the Charlotte-Mecklenburg area, or within 25 miles of Mecklenburg County, or must provide a job offer letter from a prospective employer. A port-in that willfully or intentionally terminates their employment will be deemed ineligible by CHA’s program and the participant voucher will be returned to the issuing housing authority. A participant who loses employment or works less than 20 hours a week at no fault of their own will have the work requirement waived for 6 months or until a household has found employment; whichever is sooner. After 6 months of being unemployed, the participant will be recommended for termination and afforded an informal hearing prior to establishing any final ineligibility determination.

3) Implement a Single Platform for Inspections

CHA proposes to standardize Housing Choice Voucher, Project Based Voucher and Public Housing inspection processes. The agency will adopt the same inspection processes and standards for all programs. CHA would use the Uniform Physical Condition Standard (UPCS) as the model for inspection in lieu of Housing Quality Standards (HQS). CHA’s current inspectors would be trained to perform UPCS inspections. Some aspects of the HQS inspections may be incorporated for some elements. CHA anticipates a 50% reduction in cost and time spent on inspections utilizing this process.

These amendments will be added to the plan following the public hearing on May 19, 2015 at 5:00 p.m., Board approval, and final approval from the Department of Housing and Urban Development.

If you would like to view the entire copy of the Fiscal Year 2015 – 2016 Annual Plan, please visit <http://www.cha-nc.org/page.asp?urh=MovingForward> or visit our office located at 400 East Boulevard during the hours of 8:00 a.m. – 5:00 p.m. If you have any questions regarding the Annual Plan Amendment, please contact Gwenarda Isley, Moving To Work Coordinator, 704.432.5557.

2016-7 Controlled Program Moves

A. Describe each proposed MTW activity

The Charlotte Housing Authority (CHA) proposes an activity to approve elective move transfers only if the participant has lived in the current unit for a minimum of eighteen (18) consecutive months unless the situation involves a mandatory or permissible move.

Mandatory :

- Abatement
- Breach of contract by owner
- Transfer of ownership where new owner is not participating in the HCV program
- Notice of Pending Foreclosure
- Under housed
- Natural disasters that make the unit uninhabitable
- Decrease in the Payment Standard

Permissible:

- Domestic Violence

- Reasonable Accommodations
- Health or safety of a family member (e.g. lead-based paint hazards, domestic violence, and witness protection programs), or to address an emergency situation over which a family has no control.

Other requests shall be processed on a case-by-case basis at the discretion of the Chief Executive Officer, or his/her designee. Third party documentation will be required for all requests inside of the 18 month period. Owner agreement to termination may be applicable in some situations. This activity will apply to all tenant based voucher holders and port-ins.

- B. Describe how each proposed activity will achieve one or more of the three statutory objectives.
 This activity will meet the statutory objective to reduce cost and achieve greater cost effectiveness in federal expenditures. CHA will reduce staff time engaged in processing transfer requests.
- C. Identify and discuss the anticipated impact of each proposed MTW activity on the stated objective(s).
 CHA’s Housing Specialists are processing a great amount of requests for moves in a one year period, as well as at the end of a one year lease. By limiting the number of moves for Housing Choice Voucher participants an administrative burden will be lifted and family stability can be gained.

D. Standard HUD Metric	E. Baseline	F. Benchmark	G. Final Projected Outcome	Benchmark Achieved
CE#1: Agency Cost Savings				
Decrease in total cost of processing move requests	\$26,230 per year	\$13,115 per year	To be reported on in the FY2016 Annual Report	To be reported on in the FY2016 Annual Report
CE#2: Staff Time Savings				
Decrease in total staff time (in hours) transfers	1,398 hours per year	699 hours per year	To be reported on in the FY2016 Annual Report	To be reported on in the FY2016 Annual Report

- H. Give the data source from which metric data will be compiled.
 CHA will track the number of transfer request, reason for move and whether approved or declined.
- I. Cite the authorization(s) detailed in Attachment C or D of the Standard MTW Agreement that gives the PHA the flexibility to conduct the activity.
 CHA is using Attachment C, Section D. Authorizations Related to Section 8 Housing Choice Vouchers Only, 1. Operational Policies and Procedures
- a. The Agency is authorized to determine the term and content of Housing Assistance Payment (HAP) contracts to owners during the term of the MTW demonstration. However, any revised HAP contract must include language noting that the funding for the contract is subject to the availability of Appropriations.
- b. The Agency is authorized to determine the length of the lease period, when vouchers expire and when vouchers will be reissued.
- g. The agency is authorized to establish its own portability policies with other MTW and non-MTW housing authorities.

- J. Explain why the cited authorization from Attachment C or D is needed to engage in this activity.
CHA is spending an exorbitant amount of resources addressing transfers because the regulations authorize households to move after a one year period. The waiver is needed to amend the current transfer policy.
- K. Additional Information for Rent Reform Activities
This is not a rent reform activity.

2016-5 Work Requirement for New Incoming Portability Families-Pilot Program

- A. Describe each proposed MTW activity

CHA would like to establish an initiative requiring all new incoming portability families (“port-ins”) to either be working or have a verifiable employment offer when porting into Mecklenburg County. This policy will not apply to elderly, disabled or domestic violence households.

Port-ins must be employed within the Charlotte-Mecklenburg area, or within 25 miles of Mecklenburg County, or must provide a job offer letter from a prospective employer prior to porting into CHA’s program. The employment will be verified at time of admission to CHA and all eligible members must be compliant at the time of admission. All children under the age of 18, who have not graduated from high school or received their GED, must be enrolled in school full time.

A porting household that willfully or intentionally terminates their employment will be deemed ineligible by CHA’s program and the participant voucher will be returned to their issuing housing authority. A participant who loses employment or works less than 20 hours a week at no fault of their own will have the work requirement waived for 6 months or until a household has found employment; whichever is sooner.

During the 6 month waiver period, the port-in must be involved in a CHA Approved Work Related Activity or provide evidence of an Excusable Absence from Work Related Activities and/or Workshops (please see Exhibit 3-2 of the CHA Administrative Plan).

If a port-in is considered a minimum renter, the port-in may qualify for a rent exception of its minimum rent based on hardship, which is not to exceed a 12 month period depending on type of hardship. Please refer to Chapter 6-II.B of the CHA Administrative Plan. A hardship exemption does not waive the requirement of entering into a CHA Approved Work Related Activity.

To be considered employed, a participant must be working for a minimum of 20 hours per week. If this threshold has not been achieved during the waiver period, the, the participant will be recommended for termination and afforded an informal hearing prior to establishing any final program termination. Exceptions to the six month rule may be made on a case-by-case basis. Exceptions may include: short or long term verified medical issues for immediate family members who include spouse, children, parents and grandparents.

- B. Describe how each proposed activity will achieve one or more of the three statutory objectives:

The activity would reduce costs and increase cost effectiveness. There are significant amounts of port-ins that are porting from other jurisdictions with administrative fees less than CHA’s. In addition, CHA is planning to implement an agency wide work requirement in the future and will be providing case management and/or other supportive assistance for the Housing Choice Voucher households.

- C. Identify and discuss the anticipated impact of each proposed MTW activity on the stated objective(s).

By having a work requirement for port-ins, CHA will 1) be able to maintain a stable, diverse and healthy income mix in the City of Charlotte and assist with de-concentration efforts; and 2) increase the amount of units available to extremely low to very low-income households. Additionally, CHA believes that increased caseloads will result in frequent employee turnover, the need to hire additional staff and/or escalation of uncalculated errors.

- D. Provide the anticipated schedules for achieving the stated objective(s).
Upon approval of the activity

E. Standard HUD Metric	F. Baseline	G. Benchmark	H. Final Projected Outcome	Benchmark Achieved
CE #1: Agency Cost Savings				
Decrease total cost of processing port-ins	\$2,704.00 per month	\$541.00 per month	To be reported on in the FY2016 Annual Report	To be reported on in the FY2016 Annual Report
CE #2: Staff Time Savings				
Decrease total staff time to complete the processing of port-ins	125 hours per month	25 hours per month	To be reported on in the FY2016 Annual Report	To be reported on in the FY2016 Annual Report
CE# 3: Decrease in Error Rate of Task Execution				
Decrease in number of errors during lease up	62% error rate during lease up	20% error rate during lease up	To be reported on in the FY2016 Annual Report	To be reported on in the FY2016 Annual Report

- I. Give the data source from which metric data will be compiled.
CHA will track the number of port-in request that are processed by staff.
- J. Cite the authorization(s) detailed in Attachment C or D of the Standard MTW Agreement that gives the PHA the flexibility to conduct the activity.
CHA is using Attachment C, Section D. Authorizations Related to Section 8 Housing Choice Vouchers Only, g. The agency is authorized to establish its own portability policies with other MTW and non-MTW housing authorities.
- K. Explain why the cited authorization from Attachment C or D is needed to engage in this activity.
The waiver is needed to amend the current portability policy to allow CHA flexibility in maintaining a manageable case load for housing specialist.
- L. Additional Information for Rent Reform Activities
This is not a rent reform activity.

2016-6 Implement a Single Platform for Inspections

A. Describe each proposed MTW activity

CHA proposes to standardize Housing Choice Voucher, Project Based Voucher and Public Housing inspection processes. The agency will adopt the same inspection processes and standards for all programs. CHA would use the Uniform Physical Condition Standard (UPCS) as the model for inspection in lieu of Housing Quality Standards (HQS). CHA's current inspectors would be trained to perform UPCS inspections. Some aspects of the HQS inspections may be incorporated for some elements.

B. Describe how each proposed activity will achieve one or more of the three statutory objectives.

The streamlined, cost-effective approach will reduce cost and increase cost effectiveness.

C. Identify and discuss the anticipated impact of each proposed MTW activity on the stated objective(s).

By having a single platform inspection, CHA's customers would have greater predictability regarding inspection outcomes and CHA would incur lower cost through self-certification versus re-inspection.

D. Provide the anticipated schedules for achieving the stated objective(s).

Upon approval of the activity CHA will phase in the new inspection process based upon each unit's reexamination schedule. CHA will use a third party contractor to conduct the UPCS inspections during the transition for certifying CHA inspectors to perform UPCS inspections.

E. Standard Metric	HUD	F. Baseline	G. Benchmark	H. Final Projected Outcome	Benchmark Achieved
CE#1: Agency Cost Savings					
Decrease total cost of re-inspections in dollars		\$73,208 cost for re-inspections in FY2015	\$24,403 cost for re-inspections in FY2016	To be reported on in the FY2016 Annual Report	To be reported on in the FY2016 Annual Report
CE#2: Staff Time Savings					
Decrease total time to complete re-inspections in staff hours		3,748.50 hours spent on re-inspections	1249.50 hours on re-inspections in FY2016	To be reported on in the FY2016 Annual Report	To be reported on in the FY2016 Annual Report

I. Give the data source from which metric data will be compiled.

CHA will use our software system, Yardi, to track the number of inspections scheduled, conducted and reinspected each year.

J. Cite the authorization(s) detailed in Attachment C or D of the Standard MTW Agreement that gives the PHA the flexibility to conduct the activity.

CHA is using Attachment C, Section C (9) Simplification of Property Management Practices and Section D (5) Ability to Certify Housing Quality Standards.

K. Explain why the cited authorization from Attachment C or D is needed to engage in this activity.

The waiver is needed to amend the inspection process used for Housing Choice Voucher units.

L. Additional Information for Rent Reform Activities

This is not a rent reform activity.