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MTW PLAN

I. MOVING TO WORK PROGRAM VISION

The County of Volusia’s vision for Moving to Work (MTW) Program is to provide safe, decent, and sanitary housing conditions for families and to manage its resources efficiently. The County of Volusia’s Moving to Work Program model promotes personal, economic, and social upward mobility to provide families the opportunity to increase self-sufficiency and make the transition from traditional subsidized housing to non-subsidized housing. The County of Volusia’s MTW Program will develop and implement a comprehensive, integrated and coordinated service delivery model that combines housing, coaching and mentoring, life skills, empowerment, education, and workforce development. The County of Volusia believes that ending poverty requires the implementation of this new model that includes support services for low-income families and individuals to acquire the skills and competencies they need to move up the career ladder into higher paying and stable jobs. In addition, the County of Volusia will encourage and emphasize options in areas located outside of poverty and minority concentration, career driven employment, and exceptional and secondary educational opportunities.

The purpose of the MTW program is to provide nontraditional section 8 rental assistance to eligible families. By participating in the MTW Demonstration Program the county will be able to utilize the program’s available flexibilities to sustain financial viability through more efficient business processes while also addressing limited housing, employment, and educational opportunities. The affordable housing stock in the county is limited. The Path Forward – Strategies for Success Five-Year Plan, published by the county in 2022, compared the number of available affordable rental units to the number of low-income renter households, Volusia County was found to have a 11,530-unit shortage in affordable housing inventory for households with income at or below 50% of the Area Median Income. The five-year plan also compared fair market rents with the median wages of common occupations in Volusia County and found that many households pay more than 30% of their income toward housing, even if they were able to secure a two-bedroom unit at the fair market rate. The data found that some
households with only one member earning an income pay more than 50% of their income towards their housing costs, leaving them extremely cost-burdened. The County of Volusia continues to address the housing shortage using the strategies laid out in the five-year plan, including maximizing funding streams, creating an environment that is supportive of affordable housing development, and seeking new funding sources. The vision of the MTW Program will address the issue from another angle, the incomes of households, by working with partners to expand the self-sufficiency program and supportive services to tackle the challenges that voucher holders face.

The County of Volusia will carry out the MTW Demonstration Program in conformity with title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, Executive Order 11063, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, Age Discrimination Act of 1975, title II of the Americans with Disabilities Act of 1990, Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule, Violence Against Women Reauthorization Act of 2013 (VAWA). The County of Volusia will take steps to ensure that families, owners, and the community are fully aware of all applicable civil rights laws. As part of the briefing process, the County of Volusia will provide information to the MTW applicant families about civil rights requirements and the opportunity to rent in a broad range of neighborhoods. The County of Volusia will inform owners and or landlords of the requirement not to discriminate against any person because of race, color, religion, sex, national origin, age, familial status, or disability in connection with the MTW Program.

II. PLAN FOR FUTURE COMMUNITY/RESIDENT ENGAGEMENT

The County of Volusia is responsible for ensuring that families have access to all types and ranges of affordable housing, particularly housing outside areas of poverty or minority concentration. A critical element in fulfilling this responsibility is for the County of Volusia to ensure that a sufficient number of owners, landlord, residents, and community leaders, representing all types and ranges of affordable housing and available services in the County of Volusia are willing to participate and or partner with the MTW Program. The County of Volusia will conduct owner, landlord, participant, and community outreach to ensure that everyone
interested is familiar with the program and its advantages. The County of Volusia will actively recruit owners and landlords located outside areas of poverty and minority concentration, and community partners with available supportive services. As the program is implemented, the identified outreach strategies will be monitored for effectiveness and adjusted as needed. The following strategies will be used:

- Distributing material about the program.
- Contacting current and potential owners, landlords, participants, and community partners about opportunities to participate in the program.
- Holding recruitment/information meetings at least once a year.
- Participating in community-based organizations.
- Developing working relationships with owners, landlords, participants, and community partners.

III. OPERATING AND INVENTORY INFORMATION

The County of Volusia administers 322 Housing Choice Vouchers, one Foster to Youth, and 39 Mainstream Vouchers. The County of Volusia is consistently researching additional resources to assist our most vulnerable individuals and families.

The County’s voucher programs consist of 95% single-headed households and 5% couples; 86% of all heads of households are female while 14% are male; 7% of all head of households have earned income from wages; 22% receive Social Security benefits; 11% receive SSI benefits; and the balance of 60% have other sources of income. Voucher families are 58% White; 41% Black; and 1% of Mixed Race; of these families. 61% are non-Hispanic and 39% are Hispanic.

Many Housing Choice Voucher Program participants have little to no access to high quality housing located outside areas of poverty and minority concentration. The lack of access may be attributed to the unwillingness of landlords to participate in the voucher program, or to the payment standards amounts which limit the choices available to voucher holders.
The implementation of the MTW self-sufficiency Program is anticipated to increase the percent of earned income households served. The self-sufficiency model is designed to address and increase employable and sustainable skills. The MTW self-sufficiency Program goal is to empower participants to use their assistance as a tool to become self-sufficient and eventually to longer need or utilize public assistance programs.

IV. PLAN FOR LOCAL MTW PROGRAM

The County of Volusia plans to adopt statutory objectives to reduce costs, manage resources, and increase participant’s self-sufficiency. The County of Volusia will implement the following cost-effective initiatives, self-sufficiency, and housing choice strategies under the MTW Program.

COST EFFECTIVENESS

The County will increase cost effectiveness through several tools available as part of the MTW Program. Administration costs will be reduced by changing the methodology of rent calculations, inspections, utility reimbursements and recertifications.

- **Simplification of Rent Calculation** – Actions to streamline calculations will include the elimination of assets and deductions; flat utility allowances; elimination of EID; and simplification of income determination. This initiative will result in reduced staff time calculating tenant rent; thus, lowering operational costs for program administration.

- **Alternate Inspection Requirements** – Alternate requirements will include an initial inspection and owners will certify to HQS compliance standards or NPSIRE compliance standards once implemented. Each year, 20% of all units will be randomly selected for inspection. The County will conduct additional inspections if there is a health/safety issue or concern present. When inspections are performed, the County will identify if the landlord or the tenant is responsible for addressing the deficiency noted. This initiative will significantly reduce the number of inspections resulting in a reduction of staff hours and associated costs; thus, lowering program administration costs.

- **Utility Reimbursements (UR)** - The County will eliminate utility reimbursement payments when the utility allowance is greater than the total tenant payment. The County plans to increase the minimum rent to $75, this will reduce the number of families that qualify for
UR. This will reduce the time and cost associated with cutting checks and mailing them to utility companies.

- **Interim Recertifications** - An interim will be conducted once annually if the total household income decreases by 10% or more through no fault of the tenant. This will reduce the number of interim recertifications and reduce staff costs accordingly. Households at zero income will have an interim certification performed when new income begins, or after 3 months of zero income. For households experiencing a hardship beyond these parameters, the county will consider classifying it as a long-term hardship. The hardship policy allows the PHA the flexibility to address unique, unforeseeable circumstances that may occur and to protect families in crisis. To be considered for a hardship exemption, the household must apply for all benefits for which it may be eligible. Zero-income households must report income changes when income begins. For households experiencing hardship beyond 90 days, the County will consider classifying it as a long-term hardship. If the County determines there is a long-term hardship the family will be exempt from the MTW requirements until the hardship no longer exists.

- **Triennial Recertifications** will reduce the frequency of tenant reexaminations for all families allowing one interim adjustment per year at the request of the household if the household's gross income has decreased by 10% or more. Triennial reexaminations are a potentially strong incentive to encourage increased work and earnings. It would allow more years to pass before families are required to have their eligibility or their "total tenant payment" (TTP) re-determined, a process commonly referred to as "recertification." A change in the recertification timeframe from an annual recertification schedule to a longer recertification period means that no matter how much a family earns during that period, none of the increased earnings would go toward higher contributions for rent and utilities (as would be true under traditional rules). An extended recertification period could also reduce the administrative burden: staff would spend less time conducting re-certifications, and families would spend less time having to document and report their incomes to the County of Volusia. The triennial reexaminations will begin with families whose recertification is effective 6 months after HUD’s approval of the MTW
Program. It will take a complete year to phase all families into MTW. Additional families will be phased in at the time of their annual recertification. The County will continue this process until all current and new families are phased in. This process will take approximately a year to implement.

SELF-SUFFICIENCY

The purpose of the County of Volusia self-sufficiency program is to coordinate housing assistance with public and private resources to enable assisted families to achieve economic self-sufficiency. The objective of the self-sufficiency program is to reduce the dependency of low-income families on welfare assistance, public assistance or any Federal, State, or local rent or homeownership program. The County of Volusia will measure the success of the MTW self-sufficiency program by the number of families who have become welfare free, obtain their first job or a higher paying job, obtain a diploma or higher education degree, or similar goals that will assist the family in obtaining economic dependence. The MTW self-sufficiency program will use housing assistance to leverage public and private sector resources and participants in the program to achieve economic independence. The use of housing as a stabilizing force permits the families to invest their energy in other efforts that are necessary to be self-sufficient, such as employment, education, and job training – necessary to achieve self-sufficiency. The self-sufficiency program offers financial incentives through the establishment of an escrow account. The asset becomes available to families upon successful completion of agreed upon goals. This initiative will result in self-sufficiency of program participants.

- **Work Requirement** – The concept of Self-Sufficiency within the MTW Program will be strengthened by the work requirement. The goal is to encourage families to sustain employment, and to meet educational, training, and other self-sufficiency goals necessary to reach long-term financial independence. To be eligible for continued occupancy, all family members 18 years and older must engage in eligible work activity for a minimum of thirty (30) hours per week. Exemptions may be given if the head or spouse, or sole member is age 62 or older, is a person with disabilities, or is a full-time student 18 years of age or older (not head, spouse, or cohead).
• **Phased Increased Rent or Stepped Rent** - Initial Rent: Each household will start out paying rent equal to 30% of their total monthly gross income or a minimum rent of $75 (whichever is larger). Annual Stepped Rent Increase: The County of Volusia will establish an annual stepped rent increase by unit size. After year 1, each household's rent will increase by 4% of the Fair Market Rent (FMR), unless the household is having their triennial income reexamination or there is an allowable exception for hardship. At the triennial income reexamination, the County of Volusia will document household income and any changes in household composition.

• **Term Limits** – The County of Volusia will implement a four-year term limit, with a possibility of a one-year extension for voucher holders.

• **Hardship Policy Overview** - The County Hardship Policy allows the flexibility to address unique, unforeseeable circumstances that may occur and to protect families in crisis. To be considered for a hardship exemption, the household must apply for all benefits for which it may be eligible. Zero-income households must report income changes when income begins. Until income is restored to the household, households must continue to meet the definitions of hardship types mentioned above and meet all the following criteria:
  
  o Remain in compliance with all program requirements.
  
  o Not owe County any money or be current with a repayment agreement
  
  o The continued lack of income has not been through the fault of the household.
  
  o The family has applied for all available financial resources but has been unsuccessful in securing them.
  
  o Requested the hardship waiver within the deadline set by County. Households have ten business days from the date of their "Notice of Change" letter.
  
  o Have not received hardship relief for the same MTW activity previously.

• **Requesting A Hardship Exception** - The family must submit in writing a request for a hardship exception to the County within 10 business days of the rent change letter. If a family requests a hardship exemption, the County will suspend the MTW activity beginning the month following the family's hardship request. The suspension will
continue until the County determines whether a hardship exists and whether the hardship is of a temporary or long-term nature. During suspension, the family will not be required to participate in relevant MTW activities and support will be adjusted accordingly. A decision will be made as soon as possible but will not take longer than ten business days. If the request does not meet the hardship standards, MTW activities must resume and the County will collect any retroactive assistance and other fees, if applicable, through a reasonable repayment agreement. If the request does meet the hardship standards, the County of Volusia will continue to provide an exemption from the MTW activity at a reasonable level and duration in accordance with its MTW policies.

HOUSING CHOICE

The County of Volusia’s MTW Program closely models the Housing Choice Voucher Program. The MTW program offers mobility to eligible families because they may secure suitable housing anywhere in the County of Volusia’s jurisdiction and may also be eligible to move under portability to other PHAs’ jurisdictions. The below MTW flexibility activities will increase the housing choice that a household has in Volusia County.

- **Landlord Incentive Program** – Owners of properties located in areas outside of high poverty rate and minority concentrations that have never participated in the HCV program will receive a one-time incentive payment of $250 when they approve the tenancy of a voucher holder. This initiative will expand housing choice to areas of opportunity, which are areas located outside of poverty and minority concentration.

- **Local Homeownership Program** – County of Volusia will develop and implement a local homeownership program in partnership with local non-profits and the Community Assistance Division. The Community Assistance Homebuyer Assistance Program is a successful model that will be referenced, it is anticipated that the MTW homeownership requirements will be like the existing program that provides purchase assistance and closing costs.
V. PROPOSED USE OF FUNDS

To implement the MTW Program, the County of Volusia requests authority to use Housing Choice Voucher funding to promote program flexibility, cost effectiveness, and self-sufficiency. The proposed uses of funds include non-traditional housing programs; landlord incentive programs; self-sufficiency activities, accounts and payouts as described in the MTW Plan.

VI. EVIDENCE OF SIGNIFICATION PARTNERSHIPS

The County of Volusia has developed strong relationships, connections, and partnerships with various service organizations within its jurisdiction. Through various grant programs, the County of Volusia cultivates strong, consistent collaborations with supportive service agencies to provide or coordinate self-sufficiency activities. For the MTW Program to work and be successful, the County of Volusia will continue to rely on its active relationships with CareerSource, Early Learning Coalition, Human Services, Volusia Literacy Alliance, and Daytona State College. All parties involved have important roles to play. Furthermore, the county will work with these agencies to continuously provide the necessary supportive services to ensure families connect with programs needed to increase their self-sufficiency.
ADMINISTRATIVE FLEXIBILITIES INFORMATION

I. ASSESSMENT OF PAST AND EXISTING EFFORTS TO ACHIEVE ADMINISTRATIVE EFFICIENCIES

In the past, the County has worked to achieve administrative efficiencies outside of the MTW Program. The following existing practices were put in place to help increase efficiencies while operating under the traditional HCV program:

- **Minimum Rent** - The County increased the minimum rent to $50; this reduced the number of families that qualify for UR to five, which has reduced the time and cost associated with cutting checks and mailing them to utility companies.

- **Zero Income** - If a household has reported zero or minimal income (i.e., less than very low income established by HUD), the County may determine the appropriate amount based on the national standards for food, clothing, and other items or other reliable sources of available information. The County may conduct an interim reexamination once every three months if the family continues to report they have no income. This change has reduced the number of interim recertifications and reduced staff time calculating tenant rent; thus, lowering operational costs for program administration.

- **Interim Reexamination** - The County only conducts interim reexamination for households when a change in their income exceeds $2,400 annually or for families that qualify for the earned income disallowance (EID). The interim reexamination for EID qualified families is only done when the EID family’s share of the rent changes because of an Optional Reporting increase. The change to reexaminations has reduced the number of interim recertifications and has reduced staff time calculating tenant rent; thus, lowering operational costs for program administration.

II. ASSESSMENT OF NEEDED ADMINISTRATIVE EFFICIENCIES

To effectively implement the MTW Program and work toward self-sufficiency of the voucher participants, the county requests the following waivers and associated activities:
- Tenant Rent Policies - 1(j): Alternative Utility Allowance (HCV)
- Tenant Rent Policies - 1(s): Elimination of Deduction(s) (HCV)
- Tenant Rent Policies - 1(u): Standard Deductions (HCV)
- Reexaminations - 3(b): Alternative Reexamination Schedule for Households (HCV).
- Reexaminations - 3(d): Self-Certification of Assets (HCV)
- Housing Quality Standards (HQS) - 5(d): Alternative Inspection Schedules (HCV)