

Homes for Good Hardship Policy

April 22, 2024

Purpose

As a Moving to Work (MTW) housing authority, Homes for Good has the ability to waive certain HUD policies that may result in unintended negative impacts on specific households. When such policies are implemented, MTW agencies must have a hardship policy in place that allows impacted households to request relief.

MTW agencies may choose to have separate hardship policies for each MTW waiver or a single hardship policy that covers all waivers. Homes for Good chose to implement a single hardship policy for all applicable waivers. However, the agency may choose to implement additional hardship policies in the future if additional waivers are implemented that do not align with this policy.

Households Eligible for Hardship Exemption

A family qualifies for a hardship exemption when their total family share exceeds 50% of the gross income used to determine a household's rent subsidy. Total family share is defined as the family's portion of rent plus the family's utility allowance. Exceptions to this policy include the following circumstances:

- When the family's share exceeds 50% of gross income due to the family's choice to rent a unit with more bedrooms than the household's voucher size; or
- When the household has not been negatively impacted by any MTW waivers.

Submission of a Hardship Exemption

Hardship requests must be received by the 15th of each month to be eligible for a revised rent effective on the first of the next month. Hardship exemption requests and adjustments will not be retro-active.

A Hardship Request will be considered "received" when all of the following applicable documents have been submitted:

- Completed Hardship Request Form, available on Homes for Good's website;

- For households who have recently lost earned income- proof of application for unemployment;
- For households with minor children- proof of application for TANF and/or child support;
- Proof of application / participation in one of Homes for Good’s self-sufficiency programs; and/or
- Proof of application for low-income energy assistance through Homes for Good or an external community partner.

Process for Agency Review and Determination

When a family requests a hardship exemption from an MTW waiver, Homes for Good will take the following actions:

- Determine whether a hardship exists prior to the first of the following month, taking into account the aforementioned 15th of the month deadline:
 - If the request does not meet the hardship standards, there will not be any adjustments to the family’s portion of rent by Homes for Good.
 - If the request does meet the hardship standards, the agency will adjust the total family share of rent plus utilities allowances the family is responsible for by the first of the following month as follows: set the total family share to the greater of \$0 or 40% of the family’s adjusted gross income.

Family Notification

Homes for Good will take the following actions in order to promote this policy among its applicants and program participants:

- Include a copy of the hardship policy in the publicly-viewable version of its MTW Supplement to the PHA Plan, the agency’s Administrative and Occupancy Plan (ACOP), and the agency’s Administrative Plan;
- Notify applicants of this hardship policy at intake;
- Review this hardship policy with families at recertification; and
- Consider if a family qualifies for a hardship exemption when assistance is to be terminated due to an MTW activity.

Grievance Procedure

If Homes for Good denies a hardship request, the family may file a grievance according to the agency's Grievance Policy found in both Homes for Good's ACOP and Administrative Plan.