

## Asheville Housing MTW Activity No. 2024-1 – Triennial Recertifications for Non-Study Households

### Waivers approved:

- MTW Activity 3.b. - Alternative Reexamination Schedule

Asheville Housing will expand its current waiver for MTW Activity 3.b. (see Asheville Housing MTW Activity No. 2022-1 – Stepped Rent Study) to allow for triennial reexaminations of income and household composition for all households not exempted under the Stepped and Tiered Rent Demonstration. This waiver will serve the statutory goal of increasing cost effectiveness by reducing the administrative burden of completing annual recertifications for the majority of households currently receiving assistance.

### Additional Policy Provisions

- Exemptions.** Triennial reexaminations will apply to all households receiving assistance from Asheville Housing with the exception of those assigned to the Standard Rent, or Control Group, of the STRD Study. These households will continue annual reexaminations until the conclusion of the study period in 2029, after which, they will be placed on a triennial schedule in a manner that will maintain an approximate balance of total reexaminations between each year in the cycle.
- Implementation.** In order to avoid conflict with the STRD Study screening process, implementation will be delayed until at least June 1, 2024 so that there will be no overlap with the initial enrollment period.

For the first 12 months of implementation (June 2024-May 2025), there will be a pause on all non-exempted annual reexaminations. For the following twelve months (June 2025-May 2026), approximately one-third of total non-exempt households—a total which will include Stepped Rent households that were already placed on a triennial schedule the year before—will receive their first reexamination on the triennial schedule. For the following twelve months (June 2026-May 2027), another third which includes all households on Stepped Rent will recertify. Finally, in the last twelve months (June 2027-May 2028), the remaining third will recertify.

- Interim Adjustments.** Households may continue to request an Interim reexamination of income at any time. This will not replace the Triennial reexamination, nor will it affect the scheduling of the triennial reexamination at any point.

**d. Unit Transfers.** In instances where a non-exempt Tenant-Based Voucher household completes a Unit Transfer, the processing of the transfer will include and constitute a Triennial reexamination. This will hold whether they are a Project-Based Voucher household completing a Tenant Mobility Voucher move into a TBV unit or a TBV household moving to another TBV unit (even if that includes a change in voucher type, such as to Homeownership). Households that complete this process will have their next reexamination scheduled for the first of the anniversary month three years after the transfer's effective date.

PBV households transferring to another PBV unit will continue to not include a reexamination, or update to the next scheduled reexamination date.

**e. Zero Income Households.** Should a household reach Zero Income status prior to either a Triennial or Interim reexamination, Asheville Housing will monitor the household's income status using a quarterly review of EIV. When the household's income status changes, either as shown on EIV or per the household's own reporting on the matter, the income will be picked up via Interim adjustment with an appropriate 30 days' notice of the change. At this point, the household will cease to be in Zero Income status, and monitoring will be discontinued.

In instances where a household repeatedly enters and exits Zero Income status within a short period of time, suggesting a pattern of deliberately manipulating the Interim adjustment policy to artificially minimize rent responsibility while still receiving income, Asheville Housing reserves the right to limit the household to one interim adjustment per year if the household's gross income has decreased 10% or more, in keeping with Safe Harbor Provisions. This limitation will not apply if no such pattern is apparent.

Households with extended Zero Income status which are not subject to the Work Requirement Policy detailed Asheville Housing MTW Activity 2024-2 will not be terminated because they are Zero Income under this policy.

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*Waiver requested:* MTW Activity 3.b. - Alternative Reexamination Schedule

*Statutory Objective(s):* Cost Effectiveness

*Cost Implications:* Neutral

*Applies to:* New admissions and currently assisted households; all family types; tenant-based voucher families only.

*Safe Harbor Waiver Required?* No

*Impact Analysis or Hardship Policy Required?* Yes

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## **Hardship Policy – Alternative Reexamination Schedule**

**Interim Reexaminations.** As a matter of current policy, Asheville Housing does not typically pick up new income in between regularly scheduled reexaminations except in cases of fraud or unless they come with an addition to household.

Under this policy, that will remain largely remain the case such that following an Interim adjustment, the household's rent portion will not increase again until the triennial reexamination except under the following circumstances:

- i. The household reached Zero Income status as a result of the income change precipitating the Interim adjustment, and has since regained income in such a manner as to remove the Zero Income status (see section e. under “Additional Policy Provisions” above).
- ii. The household adds a new member with income.
- iii. A change in the household's deductions, such as with the passing of an elderly family member or a child turning 18 and losing dependent status.
- iv. A change in Payment Standard, Utility Allowance, or Gross Rent occurring out of cycle with the Triennial reexamination.
- v. The household requests in writing that increased income be picked up prior to Triennial Recertification.

Any Interim adjustment in which the household's rent portion will increase will include a minimum 30 days' notice of the change.

Note that these guidelines will not necessarily apply to Stepped Rent households, which will still recertify on a triennial basis, but will be governed under the Hardship Policy outlined in Asheville Housing MTW Activity 2022-1.