

Proposed: 2020-1 “Alternate Verification Activity”

A. ACTIVITY DESCRIPTION

i. Describe the proposed activity.

INLIVIAN’s alternate verification activity would extend new admission income verifications validity to 180 days from the determination and/or effective date of the lease up instead of 60 days and for annual recertification verifications from 120 days prior to the effective date of the action to 180 days to the effective date of the action. It is anticipated that this activity will reduce the amount of duplicative work caused by factors in validating all necessary information provided at the time of a completed recertification. This alternate verification activity will extend to all HCV programs including: MTW vouchers, Family Unification Program vouchers, Mainstream Program vouchers, portables, Traditional and RAD-PBVs and VASH vouchers.

ii. Describe how the proposed activity will achieve one or more of the three statutory objectives and the specific impacts on that statutory objective(s).

Implementation of this activity is designed to improve cost effectiveness by decreasing agency costs through staff time savings.

iii. Provide the anticipated schedule for implementing the proposed activity.

This activity will be implemented immediately upon HUD approval.

B. ACTIVITY METRICS INFORMATION

CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity – New Admissions: \$4,754 Recertifications: \$9,531	Expected cost of task after implementation of the activity – New Admissions: \$3,333 Recertifications: \$5,313	Actual cost of task after implementation of the activity.	Whether the outcome meets or exceeds the benchmark. (yes or no)

CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity – Recertifications:453 New Admissions:224	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours) Recertifications: 260 New Admissions: 52	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.

C. COST IMPLICATIONS

- i. **State whether the proposed activity will result in any cost implications (positive and/or negative) for the MTW PHA.**
This activity should result in positive costs savings based on staff time savings.
- ii. **If the proposed activity does result in cost implications, provide an estimate of the amount and discuss how the MTW PHA will manage the surplus or deficit anticipated.**
N/A – this activity does not result in a positive or negative cost implication.

D. NEED/ JUSTIFICATION FOR MTW FLEXIBILITY

- i. **Cite the authorization(s) detailed in Attachment C and/or D of the Standard MTW Agreement (or applicable successor section in future iterations of the MTW Agreement) that gives the MTW PHA flexibility to conduct the proposed activity.**

Attachment C- D.3(b). The Agency is authorized to adopt and implement any reasonable policy for verifying family income and composition and for determining resident eligibility that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of 24 C.F.R. 982.516 and 982 Subpart E, as necessary to implement the Agency’s Annual MTW Plan.

- ii. **Explain why the cited authorization(s) is needed to engage in the proposed activity.**
HUD’s Administrative Guidance for Effective and Mandated Use of the Enterprise Income Verification (EIV) System (PIH Notice 2017-12) states that documents must be within 60 days of the request date.