



Housing Authority

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Boulder County Housing Authority #CO061
PO BOX 471
Boulder, CO 80306

Re: Request to HUD MTW Program To Waive Safe Harbor Policy

- (a) BCHA is seeking HUD approval to waive the safe harbor policy for MTW activity 1.h Tenant Payment as a Modified Percentage of Income (HCV)—The agency may modify the percentage of income used in the TTP calculation. Tenant Payment as a Modified Percentage of Income (HCV)—Certain provisions of sections 3(b)(4)-(5) and 8(o)(2)(A)-(C) of the 1937 Act and 24 CFR 5.609, 5.611, and 982.516.
- (b) Safe Harbor 1.h.iii Agency must exempt elderly and disabled families from rent policy.
- (c) Proposed MTW activity: BCHA is seeking to eliminate the submission of medical receipts for allowance calculations and instead proposing to calculate households that qualify as elderly and disabled TTP at 26% of their adjusted income.
- (d) As of June 2024 BCHA has 927 households on the voucher program (excluding VASH) and 444 of those households or 48% are eligible to claim medical expenses but only 137 actually do. The process for submitting medical expenses deductions is arduous to both the voucher holders and staff. The average time to process medical expenses for calculation of annual income is 2 hours of the households that have excessive medical expenses exceeding 20% of their income the average time for staff to process expenses for calculation of annual income is 6 hours. This equates to 354 hours of staff time a year dedicated just to reviewing and processing medical expenses. The amount of work required of the households to record, track, store and submit their paperwork is very similar and one area we have received multiple complaints on with little return in a lot of the cases. By implementing this MTW activity we would be saving a significant amount of administrative efforts that could be redirected into the development of additional work that would directly benefit the voucher holders.
- (e) Impact analysis – see attached
- (f) Hardship policy – see attached
- (g) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.