

MOVING TO WORK (MTW) DEMONSTRATION PROGRAM PLAN

Clarion County Housing Authority

MTW Flexibility II Cohort Application – PIH Notice 2026-13

I. Agency Overview and MTW Vision

The Clarion County Housing Authority (CCHA) is a small, rural public housing agency serving residents throughout Clarion County, Pennsylvania. CCHA administers the Housing Choice Voucher Program in a rural housing market characterized by limited rental inventory, lower average rents, and a strong reliance on locally owned rental properties.

As a small agency, CCHA faces challenges that differ significantly from larger housing authorities. Federal program requirements are designed primarily for a national program structure but often do not account for the uniqueness of rural housing agencies, including limited staffing resources, smaller administrative budgets, and significant financial impacts resulting from a small number of high-cost nuances.

Through participation in the Moving to Work (MTW) Demonstration Program, CCHA seeks flexibility to develop locally responsive policies that:

- Improve administrative efficiency;
 - Reduce unnecessary regulatory burden;
 - Strengthen long-term program sustainability;
 - Better align subsidy costs with the local housing market;
 - Promote participant self-sufficiency; and
 - Preserve housing opportunities for residents within CCHA’s jurisdiction.
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II. Need for MTW Flexibility

A. Portability Cost Impact on Rural Housing Authorities

The most significant challenge facing CCHA is the financial impact of Housing Choice Voucher portability.

As a rural housing authority, CCHA operates a program where average housing assistance payments are substantially lower than those in higher-cost areas. However, under current portability regulations, CCHA remains financially responsible for households who choose to move to higher-cost jurisdictions.

A small number of portability transactions can create a disproportionate financial impact on the Authority's Housing Assistance Payment budget and reduce the number of resources available to serve local households.

CCHA currently experiences:

- Increased HAP costs associated with portability moves;
- Reduced ability to predict annual leasing costs;
- Administrative burden associated with billing and tracking portability transactions; and
- Reduced local housing assistance when resources leave the jurisdiction.

MTW flexibility would allow CCHA to test alternative approaches that maintain housing choice while improving fiscal sustainability.

III. Proposed MTW Activities

Activity 1: Portability Cost Management and Administrative Simplification

Objective:

Reduce financial instability and administrative burden associated with portability while maintaining compliance with statutory portability requirements.

Proposed MTW Flexibilities:

CCHA will evaluate and implement, where permitted by MTW authority, alternative portability procedures including:

A. Absorption-Based Portability

CCHA will encourage portability transactions in which the receiving housing authority absorbs the voucher rather than billing CCHA.

This approach would:

- Reduce long-term financial uncertainty;

- Eliminate ongoing billing administration;
- Improve budget predictability; and
- Allow receiving agencies with higher-cost markets to manage subsidy levels within their own programs.

B. Time-Limited Billing

Where absorption is not immediately available, CCHA will evaluate allowing portability billing for a defined period, such as six months, after which the receiving housing authority would absorb the voucher.

C. Shortfall Management

If CCHA enters funding shortfall status, the Authority will evaluate immediate absorption requirements for portability transactions where allowable.

Expected Outcomes:

- Reduced portability-related HAP instability;
- Lower administrative workload;
- Improved local voucher availability; and
- Increased ability to serve residents within CCHA's jurisdiction.

Activity 2: Elimination of Prorated Rent Calculations for Portability Families

Objective:

Reduce administrative complexity and improve consistency.

CCHA will evaluate eliminating prorated rent calculations for portability households where permitted under MTW authority.

Expected Outcomes:

- Reduced calculation errors;
- Less staff processing time;
- Easier communication with landlords and participants; and
- Increased administrative efficiency.

Activity 3: HOTMA Deduction Flexibility

Objective:

Simplify income calculations while maintaining program affordability.

CCHA will evaluate maintaining current deduction amounts:

- Dependent deduction: \$480
- Elderly/disabled deduction: \$400

rather than implementing higher HOTMA deduction amounts.

CCHA will implement the increased medical expense threshold from 3% to 10% to simplify calculations and reduce the number of households requiring detailed medical expense deductions.

Expected Outcomes:

- Simplified income calculations;
- Reduced administrative processing;
- Improved predictability of tenant rent calculations; and
- Reduced unnecessary documentation requirements.

Activity 4: Minimum Rent Adjustment

Objective:

Increase program sustainability while maintaining protections for vulnerable households.

CCHA will evaluate increasing the minimum rent requirement to between \$75 and \$100 per month.

A hardship exemption process will remain available for households experiencing qualifying financial hardship.

Expected Outcomes:

- Increased participant responsibility;
- Reduced administrative burden associated with extremely low rent calculations;
- Improved consistency across participants.

Activity 5: Self-Sufficiency Requirement for Zero-Income Households

Objective:

Promote economic independence and increase engagement with employment resources.

For applicable zero-income households, CCHA will evaluate implementation of a work participation or self-sufficiency requirement.

Possible activities may include:

- Documenting an active employment search;
- Applying for a minimum number of employment opportunities monthly;
- Participation in workforce development programs;
- Completion of employment readiness activities.

Appropriate exemptions will apply for:

- Elderly households;
- Disabled households;
- Caregivers;
- Other HUD-approved hardship categories.

Expected Outcomes:

- Increased connection to employment resources;
- Reduced long-term dependency;
- Improved resident economic mobility.

Activity 6: Local Preference Adjustments

Objective:

Improve service to residents within CCHA's jurisdiction.

CCHA will evaluate modifications to local preference policies including:

Mainstream Voucher Program Preference

CCHA will consider establishing a local preference for Mainstream Voucher applicants residing within CCHA's jurisdiction.

The objective is to ensure Mainstream Voucher resources primarily serve local residents with disabilities who face housing barriers.

Residency Preference

CCHA will evaluate increasing the residency preference requirement from one year to five years.

The purpose is to better align limited voucher resources with households currently residing in the community and reduce involuntary displacement.

Expected Outcomes:

- Increased service to local residents;
- Improved community stability;
- Better alignment between available resources and local housing needs.

IV. Administrative Efficiency Measures

CCHA will measure MTW effectiveness through:

- Reduced staff processing time;
- Reduced portability administration;
- Fewer interim calculations;
- Improved HAP forecasting;
- Increased leasing stability;
- Reduced documentation requirements.

V. Resident Protections

CCHA will maintain protections for vulnerable households, including:

- Hardship exemptions;
- Reasonable accommodations;
- Fair housing protections;
- Reasonable transition periods;
- Resident notification and participation.

VI. Evaluation Metrics

CCHA will monitor:

Goal	Measure
Reduce portability costs	Monthly portability HAP expense
Improve administrative efficiency	Staff hours per transaction
Improve program sustainability	HAP utilization and leasing rate
Increase self-sufficiency	Participation in employment activities & FSS participation/graduation
Reduce administrative errors	Quality control findings
Improve local service	Number of vouchers leased locally

VII. Conclusion

Participation in MTW will provide CCHA with the flexibility necessary to address challenges unique to rural housing authorities. Through targeted policy innovation, CCHA intends to improve administrative efficiency, strengthen fiscal sustainability, and preserve housing resources for residents within its community.

CCHA's proposed MTW activities will provide valuable insight into how smaller rural housing authorities can use flexibility to operate more efficiently while continuing to provide quality housing assistance to families in need.