

# PHA Name : Everett

**PHA Code :** WA006

**MTW Supplement for PHA Fiscal Year Beginning :** (MM/DD/YYYY): 7/1/2024

**PHA Program Type:** Combined

**MTW Cohort Number:** Stepped and Tiered Rent

**MTW Supplement Submission Type:** Annual Submission

## **B. MTW Supplement Narrative.**

EHA was admitted to the federal Moving to Work (MTW) Demonstration in August 2021, as part of the Stepped and Tiered Rent Cohort. EHA calls its local MTW program "Making Things Work." EHA envisions using its MTW flexibility to support three broad local initiatives that are in alignment with the street MTW statutory objectives as well as the agency's 10-Year Strategic Plan:

- A streamlining and cost savings initiative

- A resident success initiative, focused on increasing employment, earned income, and self-sufficiency (including the Tiered Rent demonstration)

- A housing choice and mobility initiative

EHA will design and test activities to further these local initiatives over the course of its 20-year term of participation in the MTW program. Proposed changes to policy and program administration, including requests for waivers, that will facilitate MTW demonstration activities will be described in successive MTW Supplements to the PHA Annual Plan.

During this upcoming fiscal year, EHA will continue to focus on waivers that will streamline program operations, reduce administrative burden, expand access to opportunity areas, and support the agency's development efforts through use of MTW flexible funding for local, non-traditional activities, and streamlining of PBV contracting. EHA will also be examining modifications needed to make the program changes effectuated by the Housing Opportunities Through Modernization Act (HOTMA) work with EHA's existing waivers and best meet local needs and market conditions.

All of the agency's efforts will be guided by its vision of Thriving Resident Households and a commitment to engaging residents and participants in the development and implementation of the Making Things Work initiative at EHA.

**C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).**

<b>1. Tenant Rent Policies</b>	
b. Tiered Rent (HCV)	Currently Implementing
s. Elimination of Deduction(s) (HCV)	Currently Implementing
<b>2. Payment Standards and Rent Reasonableness</b>	
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing
<b>3. Reexaminations</b>	
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
d. Self-Certification of Assets (HCV)	Currently Implementing
<b>4. Landlord Leasing Incentives</b>	
<b>5. Housing Quality Standards (HQS)</b>	
c. Third-Party Requirement (HCV)	Currently Implementing
d. Alternative Inspection Schedule (HCV)	Plan to Implement in the Submission Year
<b>6. Short-Term Assistance</b>	
<b>7. Term-Limited Assistance</b>	
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	
<b>9. Project-Based Voucher Program Flexibilities</b>	
d. Alternative PBV Selection Process (HCV)	Plan to Implement in the Submission Year
h. Limit Portability for PBV Units (HCV)	Currently Implementing
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
<b>11. MTW Self-Sufficiency Program</b>	
a.HCV Alternative Family Selection Procedures (HCV)	Currently Implementing
b.HCV Policies for Addressing Increases in Family Income (HCV)	Currently Implementing
<b>12. Work Requirement</b>	
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
<b>14. Moving on Policy</b>	
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
<b>17. Local, Non-Traditional Activities</b>	
b. Service Provision	Plan to Implement in the Submission Year
c. Housing Development Programs	Currently Implementing

**C. MTW Activities Plan that Everett Plans to Implement in the Submission Year or Is Currently Implementing**

<b>1.b. - Tiered Rent (HCV)</b>
<p><b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b></p> <p>See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.</p> <p>As part of the cohort-specific Rent Reform study, EHA is implementing a tiered rent policy for certain households. Qualifying families will be randomly selected to either pay under the current or the new tiered rent policy. Under the tiered rent policy, families will pay rent based on a rent schedule within tiers of \$2,500. The rent paid by the family will be based on 28% of the midpoint of the income tier corresponding to the family income. Income will be calculated based on gross income for the prior 12-month period for existing households, and based on current income for newly-admitted households.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness; Self-sufficiency</p>

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Decreased revenue; Decreased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies only to a subset or subsets of assisted households

**Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?**

New admissions and currently assisted households

**Does the MTW activity apply to all family types or only to selected family types?**

The MTW activity applies only to selected family types

**Please select the family types subject to this MTW activity.**

Non-elderly, non-disabled families

**Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?**

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

**Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.**

All tenant-based units and project-based voucher properties with participants who are non-elderly, non-disabled, and are not excluded due to being near-elderly (56 or older), currently participating in the Family Self-Sufficiency Program, or a mixed citizenship status family.

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

Study enrollment began in January 2023 for households with annual reexamination dates starting in May 2023, as well as new admissions starting May 2023. Enrollment is expected to be complete in April 2024.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

Yes

**What is the status of the Safe Harbor Waiver request?**

The waiver was previously approved.

**Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.**

The safe harbor waivers requested for the study allow EHA to implement the study as designed by HUD.

**Please describe how the income bands are structured**

Income bands are in increments of \$2,500 in annual income. Rents are set at 1/12 of 28% of the midpoint of the tier (representing monthly income), except that households with incomes below \$2,500 will pay a minimum rent of \$50.

**Please upload the tiered rent policy table that shows the income bands.**

This document is attached.

**What is the income basis for assigning households to income bands?**

This activity uses a different definition of income because we are using the following MTW waivers (check all that apply)

1.r. and/or 1.s. "elimination of deductions"

**1.s. - Elimination of Deduction(s) (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

As part of the tiered rent study, families who are selected to pay rent under the tiered rent policy will have their rent calculated using gross income from the prior 12 months (except that new admissions to the program will have their rent calculated using current gross income).

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Self-sufficiency

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased revenue

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies only to a subset or subsets of assisted households

**Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?**

New admissions and currently assisted households

**Does the MTW activity apply to all family types or only to selected family types?**

The MTW activity applies only to selected family types

**Please select the family types subject to this MTW activity.**

Non-elderly, non-disabled families

**Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?**

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

**Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.**

All tenant-based and project-based units occupied by families participating in the tiered rent study and who are selected to pay rent under the tiered rent policy.

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

Study enrollment began in January 2023 for households with annual reexaminations starting in May 2023, and for new admissions starting May 2023. Study enrollment is expected to be complete in April 2024.

**Does this MTW activity require a hardship policy?**

Provided Already

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Does the MTW activity require an impact analysis?**

Provided Already

**Which deduction(s) will be eliminated, modified, or added?**

Dependent allowance; Unreimbursed childcare costs; Other (please explain)

**Other (please explain)**

All deductions, including the dependent allowance and deduction for unreimbursed childcare costs, will be eliminated for families who are part of the tiered rent study and selected to pay rent under the tiered rent policy, as the rent for the demonstration is based on gross income. Families who would experience a significant rent increase from the loss of these deductions will be able to request a hardship adjustment to their rent calculation.

**2.d. - Rent Reasonableness – Third-Party Requirement (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

EHA will use MTW flexibility to eliminate the requirement for a third party to conduct rent reasonableness on EHA-owned or EHA-controlled units assisted with project-based vouchers. Prior to approval of this waiver, EHA had a third party determine rent reasonableness on EHA units, despite the fact that many of these units are subject to rent restrictions due to other funding sources such as RAD PBV rent restrictions. EHA incurred cost and additional staff time to have these determinations done by a third party.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Decreased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies only to a subset or subsets of assisted households

**Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?**

New admissions and currently assisted households

**Does the MTW activity apply to all family types or only to selected family types?**

The MTW activity applies to all family types

**Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?**

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

**Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.**

PBV-assisted units owned or controlled by EHA.

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

EHA began implementing the waiver.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Please explain or upload a description of the quality assurance method.**

EHA's reasonable process will include using rent comparables generated by the third party company AffordableHousing.com to identify comparable units. Rent reasonableness determinations will be performed by an EHA staff person who is trained on PBV rent reasonableness regulations. EHA will implement a streamlined process for units where the requested rent is demonstrably below market because the unit participates in a funding program, such as units with RAD rents. EHA will have a random sample of rent reasonableness determinations that EHA conducts for our own units reviewed by a third party annually as a further quality assurance measure. The third party will be a HUD-approved entity (EHA currently has HUD approval to use another local housing authority and a contracted inspector for inspections of EHA-owned units).

No document is attached.

**Please explain or upload a description of the rent reasonableness determination method.**

EHA uses the third party company AffordableHousing.com (formerly GoSection8) to generate rent comparables for the HCV and PBV programs. The AffordableHousing.com software generates at least 3 unassisted rent comparables for the subject unit, matching the unit characteristics and making adjustments based on unit-specific factors, similar to the approach used by property appraisers, and determines if the rent requested by the owner is reasonable. An EHA staff person who is knowledgeable about rent reasonableness regulations reviews the comparables to confirm that they are comparable to the subject unit.

No document is attached.

**3.b. - Alternative Reexamination Schedule for Households (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

EHA has received approval for two separate waivers implementing triennial reexaminations for different household types.

In FY22 (see FY22 MTW Supplement for full description), EHA received approval to implement triennial reexaminations for families who are part of the Tiered Rent Demonstration and selected to pay under the tiered rent policy.

In FY23 (see FY23 MTW Supplement for full description), EHA received approval to implement triennial reexaminations for households where the head, co-head, and/or spouse is elderly or disabled, and the household has at least 90% of their income from fixed sources. EHA is calling this initiative Simple Rent and it is part of the overall streamlining efforts EHA is undertaking with its MTW flexibility.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Self-sufficiency

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Decreased revenue; Decreased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies only to a subset or subsets of assisted households

**Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?**

New admissions and currently assisted households

**Does the MTW activity apply to all family types or only to selected family types?**

The MTW activity applies only to selected family types

**Please select the family types subject to this MTW activity.**

Other – another specifically defined target population or populations.

**If Other Selected in Previous Question: Please describe this target population in the text box.**

Triennial reviews under the Tiered Rent Demonstration apply to non-elderly, non-disabled households who are selected to be part of the Tiered Rent group.

Triennial reviews under the Simple Rent initiative apply to elderly and disabled households with mostly fixed income sources.

**Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?**

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

**Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.**

Tenant-based and project-based voucher units occupied by families who are eligible for either the Tiered Rent or Simple Rent policy.

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

FY22 Tiered Rent for employment-focused families - HUD waiver approved and enrollment in rent study began in January 2023. Enrollment is expected to be complete in April 2024.

FY23 Simple Rent waiver - EHA is currently in the planning stages for implementing this waiver and expects to roll it out later in the 2024-2025 fiscal year.

**Does this MTW activity require a hardship policy?**

Provided Already



**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

Yes

**What is the status of the Safe Harbor Waiver request?**

The waiver was previously approved.

**Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.**

The safe harbor waiver is for Tiered Rent triennials and allows EHA to implement the tiered rent policy as designed by HUD.

**Does the MTW activity require an impact analysis?**

Provided Already

**What is the recertification schedule?**

Other

For the Tiered Rent study, tiered rent households will be on a triennial reexamination schedule. No interim reviews will be made and no adjustments will be made to TTP between reexaminations unless the family requests a hardship.

For the Simple Rent initiative for primarily fixed income elderly/disabled households, a full reexamination will be done every three years, and a streamlined reexamination to apply cost of living adjustments will occur annually in between.

**How many interim recertifications per year may a household request?**

2 or more

**Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.**

FY23 approved for Qualifying Elderly/Disabled Households under Simple Rent: If a household's income increases in between triennial reexaminations, aside from published COLAs, the family total tenant payment (TTP) will not increase. While TTP will not increase, the household's rent may increase if their unit's contract rent is above their payment standard. Families may continue to request interim reexaminations due to a decrease in income. There will be no limit to the number of interim reexaminations allowed to be requested. If a family believes they have another circumstance that qualifies as a financial hardship, they may request a hardship.

See the FY23 MTW Supplement for a full description of this hardship policy.

FY22 approved (Tiered Rent Demonstration): The previous request for triennial reexaminations as part of the Tiered Rent Demonstration does not allow for any interim recertifications, but households may request temporary hardships lasting 6-12 months. See the FY23 MTW Supplement for a full description of this hardship policy.

### **3.d. - Self-Certification of Assets (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented by EHA.

This waiver will improve cost effectiveness in our effort to reduce administrative burden while still maintaining the integrity of the rent calculation process. This activity contributes to our larger streamlining initiative, which seeks to achieve greater efficiency and remove administrative barriers.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Decreased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

This waiver has been fully implemented.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Please state the dollar threshold for the self-certification of assets.**

\$50,000.

**5.c. - Third-Party Requirement (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

See the FY22 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.

EHA will be allowed to complete HQS inspections on PBV units that it owns or controls. This contributes to our streamlining and cost savings initiative, as EHA previously expended significant resources coordinating and paying third-party inspectors to complete HQS inspections on units that the agency owns or controls.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Decreased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies only to a subset or subsets of assisted households

**Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?**

New admissions and currently assisted households

**Does the MTW activity apply to all family types or only to selected family types?**

The MTW activity applies to all family types

**Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?**

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

**Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.**

EHA-owned or controlled units under the project-based voucher program.

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

Additional EHA staff were trained and certified in the HQS inspection standard in FY23 to facilitate implementation of this waiver. EHA no longer requires the services of a contract inspector, other than for the quality assurance inspections.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Please explain or upload the description of the quality assurance method:**

Following will explain the quality assurance method

EHA will continue to inspect units to the HQS standard found at 24 CFR 982.401, or the current standard required by HUD, and any staff conducting inspections will be trained on the HQS standard or current HUD standard (e.g., NSPIRE). A random sample of EHA-owned or controlled units that have been inspected by an EHA staff person will be selected for a quality control inspection by a third party. In addition, the majority of EHA-owned units with voucher assistance are also assisted with other public funding such as low-income housing tax credits, State, and or local funding which requires regular physical inspections and will provide an additional level of quality assurance. Participants will be able to request an interim inspection. EHA will obtain the services of a third-party entity to determine if PHA-owned units pass HQS, upon the request of HUD.

No document is attached.

#### **5.d. - Alternative Inspection Schedule (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

EHA plans to implement a triennial inspection schedule specifically for project-based voucher units operated by EHA. These units are already inspected annually by EHA property management staff as part of their standard property management oversight, which includes very similar inspection criteria. Removal of the requirement to complete an additional inspection, or to have to complete an inspection following two separate inspection criteria, will decrease staff time spent on administrative activities. EHA plans to continue to conduct inspections of non-EHA managed voucher units at least biennially.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Decreased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies only to a subset or subsets of assisted households

**Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new**

**admissions and currently assisted households?**

Currently assisted households only

**Does the MTW activity apply to all family types or only to selected family types?**

The MTW activity applies to all family types

**Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?**

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

**Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.**

Project-based voucher units managed by EHA.

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

N/A - new activity.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**9.d. - Alternative PBV Selection Process (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

EHA plans to implement an alternative selection process for PBV properties developed or acquired and rehabilitated by EHA or through a affiliate or partnership of which EHA is a participant. Instead of conducting an RFP, EHA will award PBVs to new EHA-affiliated developments or acquisition/rehabilitation projects based on threshold criteria: 1) The units proposed for PBV assistance at the development will serve households at or below 50% of the area median income, 2) the development demonstrates the need for PBV subsidy based on an operating pro forma showing that PBV subsidy is needed to serve the target income population for the proposed assisted units while ensuring that the development is financially feasible, and 3) the commitment of PBVs will not result in EHA exceeding the applicable PBV program cap (including any increases to the cap under approved MTW waivers).

This waiver will decrease the administrative burden and staff cost associated with conducting a competitive process to award PBVs to a development that is being constructed or acquired and rehabilitated by EHA or an EHA affiliate or partnership. This waiver is in alignment with EHA's Strategic Plan, as well as its PHA Plan objectives, to increase EHA's housing portfolio by 1,500 units primarily through new construction, and to increase access to housing in communities of opportunity.

In awarding PBVs to any property, EHA will meet the following safe harbor requirements for this waiver: EHA will continue to follow the requirements of PIH Notice 2013-27, and EHA will have an independent entity conduct HQS inspections before executing a PBV HAP contract.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Decreased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies only to a subset or subsets of assisted households
<b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b> New admissions (i.e., applicants) only
<b>Does the MTW activity apply to all family types or only to selected family types?</b> The MTW activity applies to all family types
<b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b> The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
<b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b> Project-based voucher units that are selected under this alternative process.
<b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b> N/A - new activity
<b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b> No

<b>9.h. - Limit Portability for PBV Units (HCV)</b>
<b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b> See the FY23 MTW Supplement for a full description of this activity. This activity has been approved by HUD and is currently being implemented.  This waiver modifies the regulations at 24 CFR 983.261, which require EHA to give tenants who have lived in a project-based voucher (PBV) unit the next available opportunity for tenant-based assistance. This activity enables EHA to prioritize limited resources to the neediest families and align available housing resources with community needs. Instead, EHA will implement a modified prioritization for turnover vouchers.  EHA typically experiences turnover of about 200 vouchers per year due to attrition. Under current policy, families living in PBV units are given priority to receiving tenant-based vouchers after only one year of residency, while retaining project-based voucher assistance at the unit, which reduces the number of tenant-based vouchers available to new families on the waiting list. In addition, EHA has identified the need to prioritize choice mobility for tenants living at EHA's Pivotal Point property, which serves families who have experienced domestic violence. This 20-unit property is operated in partnership with Domestic Violence Services of Snohomish County, the local domestic violence services organization in our community. Due to the specific population served at this property, EHA has identified that these families would benefit from being prioritized for tenant-based assistance once they have lived at Pivotal Point for at least 12 months.  Under this MTW activity, EHA has implemented implement a multi-tiered prioritization model: 1. Turnover vouchers will first be issued to households in RAD PBV properties and who live at Pivotal Point, based on date and time of voucher request after at least 12 months of occupancy in their PBV unit. 2. Of the remaining turnover vouchers available during the calendar year, 20% will be issued to tenants moving out of a PBV unit, based on date and time of voucher request after at least 12 months of occupancy in their PBV unit, and 80% will be issued to households on the tenant-based voucher waiting list. However, households in tier 2 who have been waiting at least 24 months for a voucher will be prioritized before issuing vouchers to households on the tenant-based voucher waiting list.  This activity will increase housing choice for families who are not yet receiving housing assistance while maintaining the stability of families who are already housed, without impacting the rights of RAD PBV tenants to choice mobility.

EHA will continue to consider requests from PBV tenants for tenant-based assistance due to VAWA (domestic violence) or reasonable accommodations for a disability.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Decreased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies only to a subset or subsets of assisted households

**Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?**

New admissions and currently assisted households

**Does the MTW activity apply to all family types or only to selected family types?**

The MTW activity applies to all family types

**Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?**

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

**Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.**

The MTW activity applies to all properties with project-based vouchers.

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

This waiver has been implemented and EHA continues to issue vouchers under choice mobility to PBV tenants pursuant to the waiver. The initial benefits of the waiver have been limited while EHA works through the list of existing PBV tenants on the list who have been waiting at least 24 months. EHA anticipates that over time, this waiver will allow EHA to increase the share of households who will be pulled from the regular waiting list.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**11.a.HCV - Alternative Family Selection Procedures (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

See the FY23 MTW Supplement for a full description of this activity. This activity has been approved by HUD and implementation planning is underway.

Under this activity, EHA will be creating an alternative self-sufficiency program that will be offered to households participating in the Tiered Rent study (both treatment and control group households) in lieu of the traditional Family Self-Sufficiency program (the traditional FSS program will continue to be offered to non-study households). This program will use an alternative method of calculating escrow that is based on the family completing milestones during their contract of participation. Participants will sign a 5-year contract of participation with a potential extension up to 2 years. Self-sufficiency and economic success coaching and referrals will be provided by the specialists working with the rent

study families. Participation in the program will be optional. EHA will not use income increases during participation in the alternative self-sufficiency program to change the eligibility status of a family for purposes of participation in the alternative self-sufficiency program or for the receipt of HCV or PBV assistance.

**Which of the MTW statutory objectives does this MTW activity serve?**

Self-sufficiency

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Neutral (no cost implications)

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies only to a subset or subsets of assisted households

**Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?**

Currently assisted households only

**Does the MTW activity apply to all family types or only to selected family types?**

The MTW activity applies only to selected family types

**Please select the family types subject to this MTW activity.**

Other – another specifically defined target population or populations.

**If Other Selected in Previous Question: Please describe this target population in the text box.**

Households participating in the tiered rent study. The tiered rent study is targeted to households that are non-elderly, non-disabled, and also excludes mixed citizenship status families and current FSS and homeownership program participants.

**Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?**

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

**Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.**

Units occupied by households participating in the tiered rent study (both tiered rent policy and standard rent policy households). Participation will be optional. Non-rent study households will continue to be offered the option to participate in the traditional FSS program.

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

Staff have begun developing the THRIVE+ program and plan to start enrollment in May 2024.

**Does this MTW activity require a hardship policy?**

No

No document is attached.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Does the MTW activity require an impact analysis?**

No

No document is attached.

**Will the MTW agency's MTW Self-Sufficiency policy make the program mandatory for anyone?**

No

**11.b.HCV - Policies for Addressing Increases in Family Income (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

See the FY23 MTW Supplement for a full description of this activity. This activity has been approved by HUD and implementation planning is underway.

This waiver is being implemented in connection with the THRIVE + initiative, the alternative self-sufficiency program offered to households in the tiered rent study, both tiered rent policy and standard rent policy households. Under this activity, EHA is implementing an alternative to the traditional FSS program that provides a milestone-based escrow deposit model, instead of the traditional model of escrow deposits based on increases in earned income. The goal for the alternative model is to provide incentives for families to increase their earned income without tying the escrow deposits to the reexamination, since tiered rent policy households will have fewer opportunities to escrow during their contract of participation. EHA will not use income increases during participation in the alternative self-sufficiency program to change the eligibility status of a family for purposes of participating in the alternative self-sufficiency program or for the receipt of HCV or PBV assistance.

Families will earn escrow credits for completing activities that will increase their financial and economic well-being and earning potential. The amount of escrow payout at the end of the contract of participation will be limited to no more than the amount of HAP cost savings generated by the family based on increases in earned income during their contract of participation, so that the escrow payout is offset by increases in family earnings, similar to the traditional FSS program.

**Which of the MTW statutory objectives does this MTW activity serve?**

Self-sufficiency

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Neutral (no cost implications)

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies only to a subset or subsets of assisted households

**Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?**

Currently assisted households only

**Does the MTW activity apply to all family types or only to selected family types?**

The MTW activity applies only to selected family types

**Please select the family types subject to this MTW activity.**



Other – another specifically defined target population or populations.

**If Other Selected in Previous Question: Please describe this target population in the text box.**

Households participating in the tiered rent study (both tiered rent policy and standard rent policy households).

**Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?**

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

**Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.**

Households participating in the tiered rent study (both tiered rent policy and standard rent policy households).

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

Staff are developing the THRIVE+ program and plan to start enrollment in May 2024

**Does this MTW activity require a hardship policy?**

No

No document is attached.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Does the MTW activity require an impact analysis?**

No

No document is attached.

**What is the policy for the increased earnings for families participating in the MTW Self-Sufficiency program?**

Families participating in the THRIVE + program will sign a 5-year contract of participation, with the possibility of up to a 2-year extension, agreeing to completion of specific milestones that will increase their economic success and earning potential. They will earn escrow credits for each activity that is completed. The final amount of the escrow payout at the end of the contract will be based on completion of the contract milestones as well as a cost neutrality calculation based on any family increases in earned income. The escrow payout can be no more than the amount of HAP cost savings generated based on increases in earned income by the family.

### 17.b. - Service Provision

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

There are two activities included under this waiver. The first activity has been approved by HUD and is currently being implemented. The second activity is new this fiscal year (FY24).

The first allows for the use of HAP and other MTW funds for supportive services and related activities to support EHA residents and program participants. All activities will be in alignment with the EHA strategic plan and its mission statement to help households to thrive. Examples of activities that EHA may use MTW funding to support include paying for service coordinators at EHA-owned/controlled properties, both with and without PBVs, to connect residents to resources to enhance the quality of their lives and increase self-sufficiency and provision of high-speed internet at certain EHA-owned/controlled properties with and without PBVs. Access to internet allows residents to participate in online services, search for jobs, and complete required voucher review activities online. All activities will support households at or below 80% of area median income.

The second activity, which is being newly added this year, will create an Inspection Success Fund that the Inspections team will use to purchase an inventory of small items needed to address minor items that cause a unit to fail an inspection. Examples of items that EHA anticipates purchasing using the fund are battery-sealed smoke detectors and switch plate/outlet covers. The goal of the fund is to increase the percentage of units that pass an inspection on the first attempt and decrease the time for a unit to pass inspection, thereby reducing staff time spent on reinspections and verifying corrective actions, reducing the amount of time before a participant can move into a new unit, and increasing landlord satisfaction with the HCV program.

The upcoming new housing inspection standard for the HCV program, the National Standards for the Physical Inspection of Real Estate (NSPIRE) will require that each bedroom have a smoke detector installed. EHA will be implementing the NSPIRE standard starting October 1, 2024. The Federally Assisted Housing Fire Safety Act of 2022 will require that, starting December 29, 2024, smoke detectors in federally assisted units have a sealed battery. EHA anticipates that these new requirements will increase the rate of failed inspections while landlords become familiar with them. In addition, EHA already frequently encounters units with minor fail items such as a cracked switch plate or outlet cover.

This waiver will allow EHA inspection staff to purchase and retain a supply of battery-sealed smoke detectors and switch plate and outlet covers that can be installed during inspections to allow the unit to pass inspection immediately. EHA staff may also identify other items to purchase using the Success Fund that would be consistent with the goal of increasing the pass rate of inspections.

**Which of the MTW statutory objectives does this MTW activity serve?**

Self-sufficiency; Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies only to a subset or subsets of assisted households

**Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?**

New admissions and currently assisted households

**Does the MTW activity apply to all family types or only to selected family types?**

The MTW activity applies to all family types

**Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?**

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

**Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.**

Different supportive services activities will support different program participants. For example, service coordination activities support residents of EHA-owned and controlled PBV properties.

The Inspection Success fund will be used for items that can be used during inspections of either HCV or PBV units.

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

The first activity within this waiver has been approved, and EHA plans to use funding flexibility to pay for certain service coordination expenses.

The second activity, Inspection Success Fund, is newly added this year.

<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>What types of services is the MTW agency providing?</b></p> <p>Service coordination at certain EHA-owned/controlled PBV properties; EHA may also provide high speed internet at certain EHA-owned/controlled PBV properties. New this year, EHA is creating an Inspection Success Fund to purchase small items to facilitate passed inspections.</p>
<p><b>How many households did the PHA provide services to in the most recently completed PHA Fiscal Year through this activity?</b></p> <p>0</p>
<p><b>Does the MTW activity apply to all LNT units/properties?</b></p> <p>The MTW activity applies to specific units/properties</p>
<p><b>Describe which LNT units/properties participate in the MTW activity?</b></p> <p>Certain EHA-owned/controlled units that offer service coordination but are not assisted with PBVs, serving households up to 80% of area median income, could be assisted with service coordination funding. The Inspection Success Fund will not apply to LNT units.</p>
<p><b>Are any families receiving services only (i.e., services only and no housing assistance provided by the PHA)?</b></p> <p>Yes</p>
<p><b># of persons receiving LNT services only in the most recently completed PHA fiscal year.</b></p> <p>0</p>

<p><b>17.c. - Housing Development Programs</b></p>
<p><b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b></p> <p>See the FY23 Supplement narrative for a full description of this activity. This activity has been approved by HUD and is currently being implemented.</p> <p>EHA has obtained MTW authority to use MTW funds, including up to 10% of HAP, to pay for activities associated with EHA development projects. This activity is in line with the EHA strategic objective to increase the EHA housing portfolio by at least 1,500 units, primarily through new development. EHA has identified multiple projects in various phases of development or in the pipeline that may receive MTW funding through this activity, as well as the potential for additional opportunities that may be identified during the upcoming fiscal year, as housing acquisition and development is opportunistic, particularly desirable properties in high opportunity areas and/or close to transit.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Decreased expenditures</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>

**Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?**

New admissions and currently assisted households

**Does the MTW activity apply to all family types or only to selected family types?**

The MTW activity applies to all family types

**Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?**

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

**Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.**

Units that receive funding under this activity - specific units are to be determined.

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

HUD approved the waiver and EHA has begun implementing the waiver by expending funds on certain development activities.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Table 17.c.1 - Housing Development Programs that the MTW Agency plans to commit Funds to in Fiscal Year**

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
RAD4PRAC Sites	Rehabilitation	Gap financing	369.00	378.00	0.00	369.00	0.00	0.00
Ben Young Senior Housing	New construction	TBD - likely gap financing	131.00	131.00	131.00	0.00	0.00	0.00
Mariner Square development	Land acquisition, new construction	TBD - likely gap financing	0.00	0.00	0.00	0.00	0.00	0.00
Bakerview/Grandview	Rehabilitation	TBD - likely gap financing	299.00	299.00	0.00	299.00	0.00	0.00
TBD - future opportunities	TBD - could be acquisition, rehabilitation, and/or new construction	TBD	0.00	0.00	0.00	0.00	0.00	0.00

**Housing Development Programs that the MTW Agency plans to spend funds on in the Fiscal Year**

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
RAD4PRAC Sites	Rehabilitation	Gap financing	369.00	378.00	0.00	369.00	0.00	0.00
Ben Young Senior Housing	New construction	TBD - likely gap financing	131.00	131.00	131.00	0.00	0.00	0.00
Mariner Square development	New construction	TBD - likely gap financing	0.00	0.00	0.00	0.00	0.00	0.00
Bakerview/Grandview	Rehabilitation	TBD; likely gap financing	299.00	299.00	0.00	299.00	0.00	0.00

**Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year**

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Madrona Square	New construction	Gap financing	67.00	105.00	0.00	67.00	0.00	0.00

**Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year**

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
	New construction	Gap financing	67.00	105.00	0.00	67.00	0.00	0.00

<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<p><b>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</b></p> <p>No Safe Harbor Waivers are being requested.</p>

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>									
<b>E.1</b>	<p><b>Agency-Specific Waiver(s) for HUD Approval:</b></p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) 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.</p> <p><b>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</b> Yes</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #333333; color: white;"> <th style="width: 50%;">Title</th> <th style="width: 10%;"></th> <th style="width: 40%;">Supporting Documents Attached</th> </tr> </thead> <tbody> <tr> <td>Inspection and Rent Reasonableness Efficiency Improvements</td> <td style="text-align: center;">0</td> <td></td> </tr> <tr style="background-color: #cccccc;"> <td>Inspection and Rent Reasonableness Efficiency Improvements</td> <td style="text-align: center;">1</td> <td></td> </tr> </tbody> </table>	Title		Supporting Documents Attached	Inspection and Rent Reasonableness Efficiency Improvements	0		Inspection and Rent Reasonableness Efficiency Improvements	1	
Title		Supporting Documents Attached								
Inspection and Rent Reasonableness Efficiency Improvements	0									
Inspection and Rent Reasonableness Efficiency Improvements	1									

<b>E.2</b>	<b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b>				
	<b>Does the MTW agency have any approved Agency-Specific Waivers?</b>				
	Yes				
	Title	Has there been a change in how the waiver is being implemented from when it was originally approved?	Please provide a description of what has changed.	Please provide a description of the final outcomes and lessons learned from implementing this Activity at your PHA.	If the MTW Agency was previously required to prepare an impact analysis, was a final impact analysis prepared at the time of discontinuation?
	PBV Choice Mobility, Affordable Payment Standard	No			
	Multiple Waivers	No			

<b>F.</b>	<b>Public Housing Operating Subsidy Grant Reporting.</b>
<b>F.1</b>	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
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<b>G.</b>	<b>MTW Statutory Requirements.</b>	
<b>G.1</b>	<b>75% Very Low Income – Local, Non-Traditional.</b> HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	<b>Income Level</b>	<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
	80%-50% Area Median Income	
	49%-30% Area Median Income	
	Below 30% Area Median Income	
	Total Local, Non-Traditional Households	<b>0</b>

\*Local, non-traditional income data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>
<b>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?</b> Yes	

<b>G.3</b>	<b>Substantially the Same (STS) – Local, Non-Traditional.</b>	
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	# of unit months	
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	# of unit months	

**Number of units developed under the local, non-traditional housing development activity that were available for occupancy during the prior full calendar year:**

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.	



Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	
2 Person	
3 Person	
4 Person	
5 Person	
6+ Person	
Totals	0

H.	Public Comment
	Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.
	Please see attached for an additional public hearing held for Agency-Specific Waiver(s) and/or Safe Harbor Waiver(s)

I.	Evaluations.
	Yes - This table lists evaluations of Everett's MTW activities, including the names of evaluators and available reports

**Table I.1 - Evaluations of MTW Policies**

Title and short description	Evaluator name and contact information	Time period	Reports available
Stepped and Tiered Rent Demonstration. EHA's participation in the second cohort of the MTW Expansion will evaluate alternative rent policies designed to increase resident self-sufficiency and reduce PHA administrative burdens. EHA will be studying a Tiered Rent model. An independent research team lead by MDRC will work with HUD, EHA, and the other selected PHAs to assist in implementation and evaluate the effects of the alternative rent policy.	James Riccio, MDRC James.Riccio@mdrc.org	July 1, 2022 through June 30, 2028	

**MTW CERTIFICATIONS OF COMPLIANCE*****U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
OFFICE OF PUBLIC AND INDIAN HOUSING*****Certifications of Compliance with Regulations:  
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (07/01/2024), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA.

Everett Housing Authority

WA006

**MTW PHA NAME**

**MTW PHA NUMBER/HA CODE**


*I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).*

Cynthia Andrews

Vice Chair, EHA Board of Commissioners

**NAME OF AUTHORIZED OFFICIAL**

**TITLE**

  
[Cynthia Andrews \(Mar 27, 2024 09:27 PDT\)](#)

**Mar 27, 2024**

**SIGNATURE**

**DATE**

\* *Must be signed by either the Chairperson or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.*

**Everett Housing Authority  
Agency-Specific MTW Waiver 1:  
Inspection and Rent Reasonableness Efficiency Improvements  
July 1, 2024, to June 30, 2025**

**Core Waiver Questions**

<b>Describe the MTW activity (including what specifically the agency is proposing to waive), the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative.</b>
<p>EHA is requesting a waiver of the regulations at 24 CFR 982.352(b)(1)(v)(A)1-(A)(3); 24 CFR 983.303(f), and certain provisions of Section 8(o)(11) of the Housing Act of 1937 requiring the PHA to use an independent entity to perform inspections and rent reasonableness determinations on units owned or controlled by the PHA, as well as to assist the family in negotiating the rent to owner in accordance with 982.506.</p> <p>Instead, EHA will apply the existing process already in place for the waiver for PBV units, where EHA self-conducts inspections and rent determinations, with a random sample of self-conducted inspections and rent determinations reviewed by a third party each year for quality control purposes. EHA works with the Housing Authority of Snohomish County (HASCO) as the independent entity to conduct these functions.</p> <p>EHA will send HASCO a list of self-conducted inspections and rent reasonableness determinations monthly for HASCO to conduct quality control reviews on, and identify the inspections and rent determinations that are randomly selected for review. EHA will provide a copy of the self-conducted inspection and rent determination documentation to HASCO with the list to facilitate the quality control review.</p> <p>EHA has existing MTW waivers of the independent entity requirement in place which apply to project-based voucher (PBV) units owned or controlled by EHA; however, HUD has informed EHA that this waiver does not extend to tenant-based assistance in units owned or controlled by EHA.</p> <p>This activity contributes to EHA's streamlining and cost savings activities, by decreasing the cost spent on an independent entity, as well as staff time to coordinate independent entity inspections and rent determinations for a subset of EHA's portfolio.</p>
<b>Which of the MTW statutory objectives does this MTW activity serve?</b>
Cost effectiveness
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b>
Decreased expenditures
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b>
A subset of assisted households

<b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b>
This activity applies to new admissions and currently assisted households, to the extent they choose to use their tenant-based voucher to occupy a unit owned or controlled by EHA
<b>Does the MTW activity apply to all family types or only to selected family types?</b>
This activity applies all family types, to the extent they choose to use their tenant-based voucher to occupy a unit owned or controlled by EHA
<b>Please select the family types subject to this MTW activity.</b>
All family types
<b>If Other Selected in Previous Question: Please describe this target population.</b>
N/A
<b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b>
No; this activity only applies to units owned or controlled by EHA, which do not have project-based subsidy and are therefore eligible for occupancy by tenant-based voucher holders
<b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b>
Tenant-based vouchers occupying units owned or controlled by EHA
<b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b>
EHA previously believed that our existing MTW waivers 2.d. and 5.c. included tenant-based vouchers. In May 2024, EHA was informed by HUD that the waiver did not include tenant-based voucher assisted units. This waiver is being requested to allow EHA to apply this flexibility to our entire portfolio.

### Implementation Timeline for Waiver

- April 2024: MTW Supplement Submitted to HUD
- June 2024: EHA Board approves updates to HCV Administrative Plan incorporating the waiver, subject to HUD approval of MTW Supplement
- July 1, 2024: Waiver goes into effect

### Impact Analysis

#### **1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)**

This waiver is expected to reduce administrative costs. There are currently approximately 126 tenant-based voucher participants living in EHA-owned or EHA-controlled units. At a cost of \$100 per inspection,

<p>conducted every 2 years, as well as initial inspections, EHA estimates that this waiver will save over \$6,000 per year in inspections costs. EHA also estimates administrative cost savings, for which EHA does not have a specific estimate, because of the amount of coordination required when a third party is conducting an inspection.</p>
<p><b>2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)</b></p>
<p>No expected impact.</p>
<p><b>3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)</b></p>
<p>No expected impact.</p>
<p><b>4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)</b></p>
<p>No expected impact.</p>
<p><b>5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program</b></p>
<p>EHA anticipates a modest positive impact on the HCV utilization rate, by decreasing the time from issuance to HAP contract execution for HCV families leasing a unit in a property owned or controlled by EHA. Over 1,000 units in EHA's portfolio have no unit-based rental subsidy, and are thus available to qualifying tenant-based voucher participants.</p>
<p><b>6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice</b></p>
<p>This activity will contribute to the MTW statutory goal of cost effectiveness by decreasing administrative expenditures. It will also contribute to the statutory goal of housing choice by decreasing barriers for tenant-based voucher participants who choose to lease a unit owned or controlled by EHA, which is expected to decrease the time from issuance to HAP contract execution.</p>
<p><b>7. Impact on the agency's ability to meet the MTW statutory requirements</b></p>
<p>No expected impact.</p>
<p><b>8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity</b></p>
<p>No expected impact. This is an administrative efficiency that should not trigger any hardship requests.</p>
<p><b>9. Across the other factors above, the impact on protected classes (and any associated disparate impact)</b></p>
<p>No expected impact.</p>

### Hardship Policy

This is an administrative efficiency that should not require assisted families to request a hardship exemption.

However, families may request a review and explanation of the unit's rent reasonableness determination and results of the HQS inspection for all EHA-owned or -controlled units receiving HCV rental assistance. Furthermore, families retain their right to request an informal hearing to contest a determination of the family's income, and the use of such income to compute the housing assistance payment, in accordance with Chapter 16 of EHA's Housing Choice Voucher Administrative Plan.

**Comments Received at Public Hearing**

None.

**Everett Housing Authority  
Tiered Rent Table**

<b>Rent Tier</b>	<b>Tier Annual Gross Income Minimum</b>	<b>Tier Annual Gross Income Maximum</b>	<b>Tiered Rent (Tenant/Participant Cost for Rent + Utility Allowance)</b>
1	\$0	\$2,499	\$50
2	\$2,500	\$4,999	\$87
3	\$5,000	\$7,499	\$146
4	\$7,500	\$9,999	\$204
5	\$10,000	\$12,499	\$262
6	\$12,500	\$14,999	\$321
7	\$15,000	\$17,499	\$379
8	\$17,500	\$19,999	\$437
9	\$20,000	\$22,499	\$496
10	\$22,500	\$24,999	\$554
11	\$25,000	\$27,499	\$612
12	\$27,500	\$29,999	\$671
13	\$30,000	\$32,499	\$729
14	\$32,500	\$34,999	\$787
15	\$35,000	\$37,499	\$846
16	\$37,500	\$39,999	\$904
17	\$40,000	\$42,499	\$962
18	\$42,500	\$44,999	\$1,021
19	\$45,000	\$47,499	\$1,079
20	\$47,500	\$49,999	\$1,137
21	\$50,000	\$52,499	\$1,196
22	\$52,500	\$54,999	\$1,254
23	\$55,000	\$57,499	\$1,312
24	\$57,500	\$59,999	\$1,371
25	\$60,000	\$62,499	\$1,429
26	\$62,500	\$64,999	\$1,487
27	\$65,000	\$67,499	\$1,546
28	\$67,500	\$69,999	\$1,604
29	\$70,000	\$72,499	\$1,662
30	\$72,500	\$74,999	\$1,721
31	\$75,000	\$77,499	\$1,779
32	\$77,500	\$79,999	\$1,837
33	\$80,000	\$82,499	\$1,896
34	\$82,500	\$84,999	\$1,954
35	\$85,000	\$87,499	\$2,012
36	\$87,500	\$89,999	\$2,071
37	\$90,000	\$92,499	\$2,129
38	\$92,500	\$94,999	\$2,187



[Continued from Previous Page]

<b>Rent Tier</b>	<b>Tier Annual Gross Income Minimum</b>	<b>Tier Annual Gross Income Maximum</b>	<b>Tiered Rent (Tenant/Participant Cost for Rent + Utility Allowance)</b>
<b>39</b>	\$95,000	\$97,499	\$2,246
<b>40</b>	\$97,500	\$99,999	\$2,304
<b>41</b>	\$100,000	\$102,499	\$2,362
<b>42</b>	\$102,500	\$104,999	\$2,421
<b>43</b>	\$105,000	\$107,499	\$2,479
<b>44</b>	\$107,500	\$109,999	\$2,537
<b>45</b>	\$110,000	\$112,499	\$2,596
<b>46</b>	\$112,500	\$114,999	\$2,654
<b>47</b>	\$115,000	\$117,499	\$2,712

*The 2021 Median Family Income for the Seattle-Bellevue Metropolitan Area, as determined by HUD, is \$115,700, which is partway through Rent Tier 47.*

## **EHA Analysis and Responses to Comments on FY 2024 MTW Supplement**

EHA received no formal written public comments on its FY 2024 Annual Plan or MTW Supplement.

EHA had multiple residents and participants at its January 30, 2024, Resident Advisory Board (RAB) meeting. No members of the public attended either the February 7, 2024, Agency-Specific Waivers meeting or the March 25, 2024, public hearing.

**Prior to Board approval of the MTW Supplement, the public's responses to the waiver proposals were considered and after PHA consideration and consultation with the RAB, no changes to the MTW Supplement were warranted.**

EHA provided answers to resident and participant questions within the context of the public meetings where the questions were posed. These questions and EHA's responses are included in the documentation provided for these meetings with the MTW Supplement.

**Annual Plan and MTW Supplement Public Hearing  
March 25, 2024**

A public hearing on Everett Housing Authority's proposed 2023-2024 PHA Annual Plan and MTW Supplement was held as part of the Housing Authority's regular Board of Commissioners meeting on March 25, 2024.

**EHA Staff Attending:**

Janinna Attick	Director of Policy and Innovation/MTW Coordinator
Jason Morrow	Chief Real Estate Officer
Linda Hoston	Director of Human Resources and Administration
Kristen Cane	Senior Director of Asset Management and Housing Choice Vouchers
Cal Cuellar	Interim Director of Housing Management
Jaysen Garcia	Executive Assistant and Communications Coordinator
Heather Stults	Strategic Engagement Manager
Chris Neblett	Administrative Supervisor

**Others Attending:**

*None*

**Presentation**

Board Vice-Chair Cynthia Andrews convened the public hearing and opened the floor to public comment on the Housing Authority's proposed 2024-2025 PHA Annual Plan and MTW Supplement.

Administrative Supervisor Chris Neblett provided a brief overview of the Annual Plan and MTW Supplement.

**Q&A/Comments**

*None*

With no additional questions or comments, Board Vice-Chair Andrews called once more for public comment on the proposed PHA Annual Plan and MTW Supplement and, receiving none, adjourned the public hearing.

**Resident Advisory Board Meeting  
Annual Plan and MTW Supplement  
January 30, 2024**

Everett Housing Authority (EHA) held a meeting of the Resident Advisory Board (RAB) on Tuesday, January 30, 2024, to receive comments and recommendations related to the development of the 2024-25 Public Housing Agency Annual Plan and MTW Supplement. This meeting took place at the main administrative office (3107 Colby) and via Zoom videoconference. Residents and program participants who attended this meeting were appointed to the RAB.

**EHA Staff Attending:**

Janinna Attick	Director of Policy and Innovation/MTW Coordinator
Jason Morrow	Chief Real Estate Officer
Linda Baines	Deputy Director of Housing Management
Chris Neblett	Administrative Supervisor
Heather Stults	Strategic Engagement Manager
Anna Todd	Housing Choice Voucher Program Manager

**RAB Members in Attendance:**

Serena [REDACTED] – Scriber Pointe (PBV)	Risa [REDACTED] – Broadway Plaza (PBV)
Brenda [REDACTED] – PBV	Pedro [REDACTED] – Broadway Plaza (PBV)
John [REDACTED] – HCV	Maxine [REDACTED] -- HCV
Eiman [REDACTED] – HCV	Michelle [REDACTED] -- HCV
Houston [REDACTED] – HCV	Tenena [REDACTED] – PBV-New Century House
Cindy [REDACTED] – Bakerview (PBV)	Jesse [REDACTED] – PBV-Woodlake Manor
Lisa [REDACTED] – Bakerview (PBV)	Vivian [REDACTED] Broadway Plaza (PBV)
Sandra [REDACTED] – HCV	Sister [REDACTED] – HCV
Kristina [REDACTED] – HCV	
Nicki [REDACTED] – HCV	
Zaineb [REDACTED] – Wiggums Park Place (PBV)	
Amelia [REDACTED] – HCV	
Arkadiy [REDACTED] -- HCV	
Courtney [REDACTED] -- HCV	

EHA staff members gave a presentation on the agency’s planned activities to further its Five-Year Goals and Objectives over the course of the 2024-25 Annual Plan year. RAB members provided comments during and after this presentation. The RAB’s comments and EHA’s preliminary response specific to each are provided in the section below.

EHA will include this preliminary response to the RAB’s comments, and other public comments received during the public review period, for EHA’s Board of Commissioners to consider at the March 25, 2024, public hearing on the Annual Plan and MTW Supplement. The Board may amend or revise one or more of these preliminary responses prior to adopting the Plan at the conclusion of the March 25 public hearing.

## **RAB Comments/EHA's Response:**

1. A RAB member asked if landlords will be able to utilize the MTW inspection flex fund to purchase larger items (i.e., appliances like refrigerators and dishwashers).

*The MTW flex fund is small in scale and limited to the purchase of smaller items (i.e., switch plate covers, smoke detectors) that will enable units to pass HQS inspections the first time out without the need for a reinspection. Landlords of subsidized units may be able to access funds to cover more substantial damages through the Landlord Mitigation Program that is administered by the state Department of Commerce.*

2. A RAB member asked whether tenant based voucher program participants will be eligible to use their voucher to move into the Ben Young Senior Housing complex once construction is complete.

*All units at this senior housing complex will be subsidized through the project-based voucher program, so a tenant-based voucher program participant would have to give up their voucher to live there (and would be eligible to be placed on the tenant-based voucher interest list after a year's tenancy).*

3. A RAB member expressed concerns about the demolition process for the remaining vacant units in the former Baker Heights neighborhood, which will be redeveloped as the Park District: will adequate safety measures be used to ensure hazardous materials are disposed of correctly, and will EHA salvage any of the usable building materials following demolition?

*EHA is subject to state and federal regulations that require ensuring the contractors responsible for the demolition follow proper abatement protocols (i.e., remove any toxic material from the site) before demolition can begin and other requirements related to health and safety during the demolition process. EHA's agreement with the contractors give the vendor discretion as to whether or not to salvage building material. Given the age and rudimentary nature of this former public housing development, it is unlikely that the building material would be of any salvageable value.*

4. RAB members had questions about the process for issuing tenant based vouchers to residents of EHA owned project based voucher developments.

*Tenants of EHA's project-based voucher properties are eligible to request a tenant-based voucher after one year of successful tenancy. Those tenants are placed on a "current interest list" and are issued vouchers in date and time order of placement on the list. Tenants of EHA properties that are not subsidized with project-based vouchers can only apply for a tenant-based voucher when the HCV (Section 8) waiting list is opened to new applicants.*

*The waiting list has been closed since 2018 due to the large number of applicants on the list, and it is not known at this time when it will re-open; however, there will be advance notice on the EHA website ([www.evha.org](http://www.evha.org)) and Facebook page, and in the Everett Herald before the HCV waiting list is re-opened to new applicants. Information about the status of program/property waiting lists can always be found on the EHA website by clicking on the "Check Availability" button on the homepage of [www.evha.org](http://www.evha.org).*

## MTW Safe Harbor and Agency-Specific Waivers Meeting February 7, 2024

### Meeting Notifications

The MTW Safe Harbor and Agency-Specific Waivers Meeting was advertised to EHA participants and members of the public via a news post on the EHA website, as well as on EHA's social media, and was also announced to the Resident Advisory Board at their January 30, 2024, meeting.

### **Website news post:**

<https://www.evha.org/news/eha-mtw-waivers-meeting-february-7-2024-2pm>

#### **EHA: MTW WAIVERS MEETING FEBRUARY 7, 2024 AT 2PM**

EVERETT HOUSING AUTHORITY: MTW WAIVERS MEETING  
WEDNESDAY, FEBRUARY 7  
2:00-3:00PM

PUBLIC COMMENT BEGINS FEBRUARY 8

EHA residents, program participants, partners, and community members: We invite you to attend a virtual meeting to learn about and comment on waivers that EHA plans to implement as part of our 2024-2025 Moving to Work (MTW) Supplement, which will go into effect July 1, 2024.

Learn more about our proposed Agency-Specific Waiver, the Inspection Success Fund!

Unable to attend the meeting? A recording of this meeting will be made available and we are asking for public comment beginning Thursday, February 8 until Monday, March 25. Share your feedback!

Questions? Email [mtw@evha.org](mailto:mtw@evha.org) or leave a message at (425) 339-1006.

ZOOM INFORMATION: WEDNESDAY, FEBRUARY 7 AT 2:00PM

Join by Phone: (253) 205-0468

Meeting URL: <https://zoom.us/j/98370270226>

Meeting ID: 983-7027-0226

**Facebook:**



**EHA Staff Attending:**

Janinna Attick	Director of Policy and Innovation/MTW Coordinator
Chris Neblett	Administrative Supervisor
Heather Stults	Strategic Engagement Manager

**Meeting Attendees:**

*None. However, the meeting was recorded and posted to EHA's YouTube page, where it has received 26 views: <https://youtu.be/MwbJAKRczTw?si=NfG3AyhfzlqWWcS>*

**Presentation**

Director of Policy and Innovation Janinna Attick gave a presentation [appended at the end of the meeting notes].

## Q&A/Comments

*None*

### **Incorporating Feedback into the MTW Supplement**

EHA engaged the public to develop the waivers, solicited comments/questions, consulted its Resident Advisory Board, considered the comments/questions before approving the Supplement and determined that no modifications to the Supplement were warranted.





# MTW WAIVERS MEETING

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FEBRUARY 7, 2024

# AGENDA



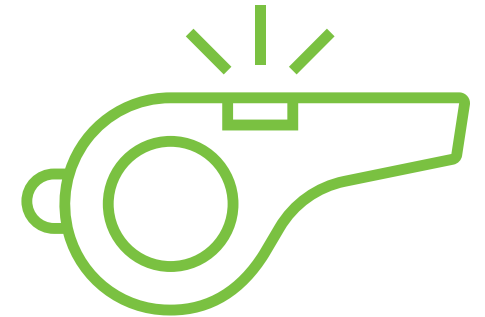
- Ground Rules
- Introductions
- Background
- Standard MTW Waivers
- Agency-Specific Waiver
- Comments/Questions
- Next Steps



# GROUND RULES



- Meeting is recorded so staff can review comments later – staff presentation portion will be posted publicly
- Raise your hand or use the “raise hand” feature (for Zoom) if you have a question or comment ***at the end of the presentation***
  - You’ll be called on once recognized
- Keep questions/comments on topic and limit to two minutes or less



# EHA STAFF INTRODUCTIONS



**Janinna Attick**

Director of Policy & Innovation/MTW Coordinator

**Chris Neblett**

Administrative Supervisor

**Heather Smith**

Strategic Engagement Manager



BACKGROUND



# WHAT IS “MTW”?



- Federal demonstration – called Moving to Work
- At EHA, we are calling it “Making Things Work”
- Allows us to set local policies and use funding flexibly to meet local needs
- Three objectives: cost effectiveness, helping families become self-sufficient, increasing housing choice

# 2024-2025 ACTIVITIES



# MTW STANDARD WAIVERS



- Conduct *voucher* inspections every 3 years in EHA-managed buildings
  - EHA staff conduct *management* inspections annually
- Modifications to PBV contracting for upcoming EHA developments:
  - Streamline process to award PBVs to EHA-developed properties
  - Increase how much of EHA's voucher portfolio can be project-based (HUD limit is 50%)



# MTW AGENCY-SPECIFIC WAIVER



- Create inspection flex fund to help units pass more quickly
  - Switch plate covers, smoke detectors, etc.
- Initial estimate of \$10,000 for the fiscal year
- Rationale: changing inspection requirements, landlord satisfaction



# COMMENTS AND NEXT STEPS



# COMMENTS/QUESTIONS



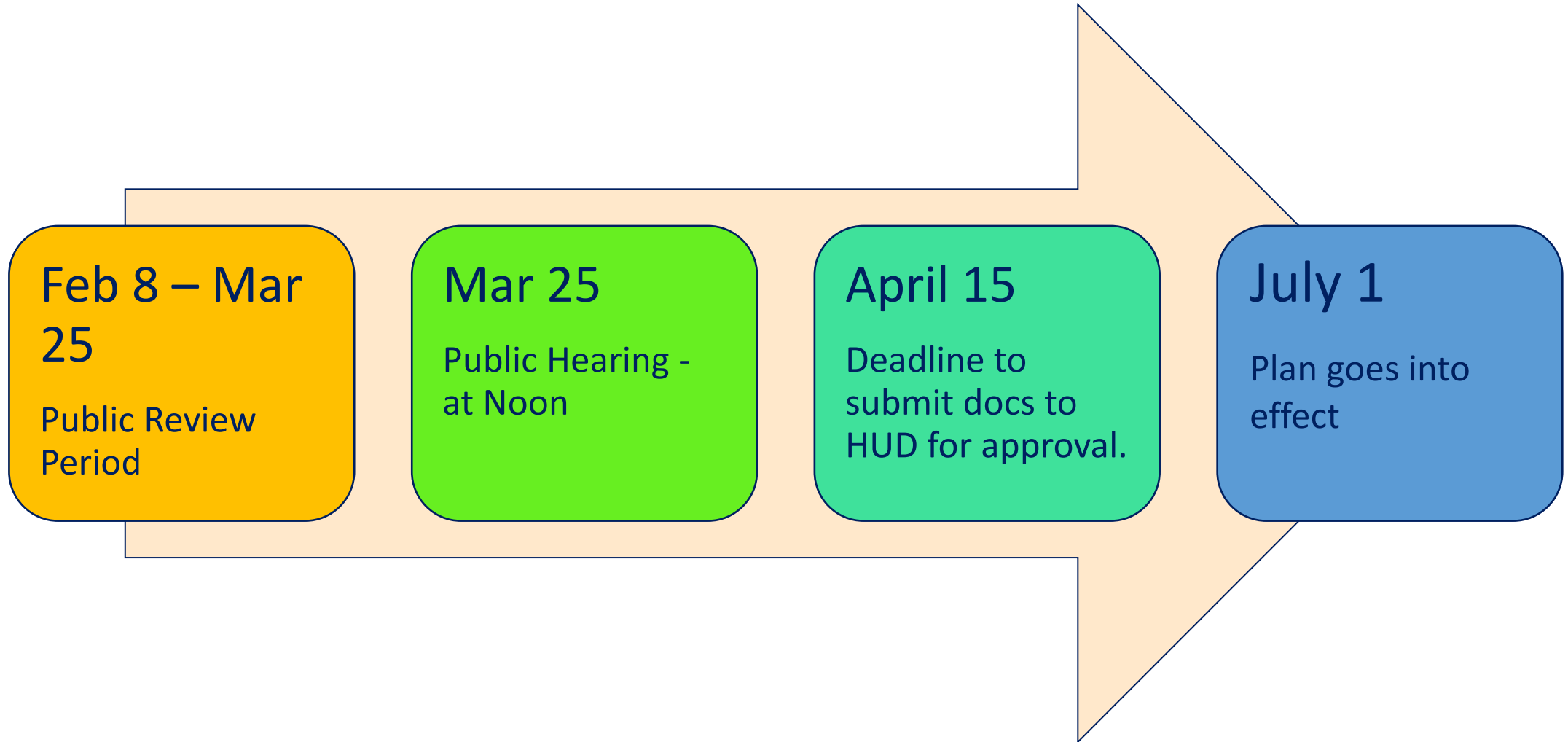
Floor is now open for comment

Please raise your hand to be recognized (\*9 if joining by phone)

- State your name and if you are an EHA participant or a member of the public
- Comments should relate to what's been presented
- Limit comments to 2 min



# NEXT STEPS







**EVERETT**  
HOUSING AUTHORITY