

# Vancouver Housing Authority

## MOVING TO WORK ANNUAL PLAN 2024 AMENDMENT

Approved by HUD November 1, 2023

Amendment submitted to HUD for approval January 29, 2024



# Moving to Work FY2024 Annual Plan Amendment

## VANCOUVER HOUSING AUTHORITY

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## SECTION I: INTRODUCTION

### A. The Vancouver Housing Authority

The Vancouver Housing Authority (VHA) was established in 1942 to house an influx of employees to the aluminum and shipyard industries during World War II. During that time, the VHA built 1,000 permanent homes and 11,396 temporary units capable of housing 50,000 people. In the 1960s, the VHA assumed the primary role we still hold today, providing subsidized housing for low-income families, elderly, and disabled people. In the early 1990s, the VHA began to diversify by purchasing and developing affordable non-subsidized housing. In 1999, HUD selected the VHA to participate in the Moving to Work (MTW) demonstration. Today the VHA provides subsidized housing to more than 3800 households and has developed more than 1,900 affordable apartment units.

The MTW program provides the VHA the opportunity to design and test innovative, locally designed strategies that use Federal dollars more efficiently, help residents find employment and become self-sufficient, and increase housing choices for low-income families. As an MTW Agency, the VHA receives exemptions from many program rules and more flexibility regarding the use of Federal funds.

#### The Moving to Work Statutory Objectives:

- ❖ Reduce cost and achieve greater cost effectiveness in Federal expenditures
- ❖ Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient
- ❖ Increase housing choices for low-income families

Initiatives developed and approved under the MTW demonstration that utilize the flexibility offered under the terms of the MTW Agreement require approval from HUD and are known as MTW Activities. Each year the VHA writes and provides for public comment an annual plan that describes ongoing and new activities that use MTW flexibility. After consideration of public comments, the plan is approved by the VHA Board of Commissioners and is submitted to HUD for final approval. The content and format of this plan is mandated by HUD and is described in an attachment to the Moving to Work Agreement. The attachment is periodically updated, and this 2024 Annual MTW Plan Amendment conforms to the latest requirements.

## **B. Short and Long-Term MTW Goals and Objectives**

Our mission is to provide opportunities to people who experience barriers to housing because of income, disability, or special needs in an environment that preserves personal dignity, and in a manner that maintains the public trust.

VHA strives to fulfil its mission by adopting values including community, fairness, integrity, leadership, customer service, equity, and inclusion.

### **PRIORITIES**

1. **Housing:** VHA will assist Clark County residents who need financial assistance to afford housing of their choice by collaborating with the private and non-profit sectors, and to create housing options by developing its own portfolio. VHA prioritizes special populations that are struggling due to income, disability, or special needs.
2. **Resident Services:** VHA will work with community partners to provide economic opportunity, social mobility, and sense of community, by supporting residents to overcome barriers and increase their education, income, and access to high opportunity neighborhoods. VHA will coordinate and oversee the delivery of services in supportive housing to ensure residents remain stably housed and improve their mental and physical health.
3. **Portfolio Management:** VHA will develop a healthy and balanced portfolio of housing that serves the community's needs and provides opportunities for resident stability and success. VHA will ensure its housing is well maintained and sustainable so it continues to be a community asset for the long term.
4. **Fiscal Strength:** VHA will be fiscally sound with diverse income and programming that supports long-term fiscal sustainability. VHA will actively pursue alternate funding to increase capacity to meet agency goals while maintaining a balanced budget of revenue, expenses, and reserve funds. When developing budgets, VHA will consider existing unit sustainability and longevity. VHA will obtain third party validation of its financial status, create sound internal controls, and strive for clean audits.
5. **Excellence in the Workplace:** VHA will create an excellent workplace where all ideas are welcome and utilized toward operational success, achieved by listening to its employees, the people we serve, other stakeholders, and by including their voices throughout our decision-making structure.

As a Moving to Work Agency, VHA utilizes the opportunity and funding flexibility to design and test innovative, locally designed housing and self-sufficiency strategies. We value this designation and fully support the MTW objectives of increased resident self-sufficiency, cost effectiveness, and housing choice.

Transition and expansion will be the theme of 2024. A new Chief Executive Officer has been appointed to take the lead in January 2024. Three (3) of the six (6) Board of Commissioners will be new. The stage is set for the next generation of VHA to tackle the ever-increasing complexity of affordable housing and to navigate challenges to secure the services needed by those we house. VHA will continue to be the leading agent in Clark County to expand the supply of

affordable housing for the most vulnerable households. Through the creative approaches that we develop because of the MTW flexibility, we can assist more households and expand the pool of partnerships with non-profit organizations. VHA will vigorously continue to expand housing stock for households that are rent-burdened through direct development or through partnerships with others. In 2024, VHA will explore the creation of affordable housing opportunities for individuals with intellectual or developmental disabilities and individuals exiting incarceration. We are also looking at expanding our tenant services with the Medicaid Foundational Community Support program and exploring partnerships to support work-able voucher holders in successfully pursuing and sustaining employment. We are exploring improvements to our voucher housing navigation assistance as well as creative opportunities to expand affordable homeownership.

VHA intends to apply for any upcoming opportunities to increase the number of vouchers available to the community we serve. VHA will also pursue Faircloth to RAD for up to 363 units before closing VHA's Public Housing ACC. In addition, VHA will extend the term of voucher assistance for FUP- and FYI-eligible youth up to an additional 24 months for those actively participating in our family self-sufficiency (FSS) program.

## SECTION II: GENERAL OPERATING INFORMATION

### HOUSING STOCK INFORMATION

#### i Planned New Public Housing Units

New public housing units that the MTW PHA anticipates will be added during the Plan Year.

ASSET MANAGEMENT PROJECT (AMP) FILL IN NAME AND NUMBER	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+BR	TOTAL UNITS	POPULATION TYPE**	SECTION 504 ACCESSIBLE UNITS* (MOBILITY)	SECTION 504 UNITS* (HEARING / VISION)
N/A										
<b>TOTAL PUBLIC HOUSING UNITS TO BE ADDED IN THE PLAN YEAR:</b>										<b>N/A</b>

\* THE FEDERAL ACCESSIBILITY STANDARD UNDER HUD'S SECTION 504 REGULATION IS THE UNIFORM FEDERAL ACCESSIBILITY STANDARDS (UFAS) FOR PURPOSES OF SECTION 504 COMPLIANCE (24 CFR 8.32). HUD RECIPIENTS MAY ALTERNATIVELY USE THE 2010 ADA STANDARDS FOR ACCESSIBLE DESIGN UNDER TITLE II OF THE ADA, EXCEPT FOR CERTAIN SPECIFIC IDENTIFIED PROVISIONS, AS DETAILED IN HUD'S NOTICE ON "INSTRUCTIONS FOR USE OF ALTERNATIVE ACCESSIBILITY STANDARD," PUBLISHED IN THE FEDERAL REGISTER ON MAY 23, 2014 ("DEEMING NOTICE") FOR PURPOSES OF SECTION 504 COMPLIANCE, [HTTPS://WWW.GOVINFO.GOV/CONTENT/PKG/FR-2014-05-23/PDF/2014-11844.PDF](https://www.govinfo.gov/content/pkg/FR-2014-05-23/pdf/2014-11844.pdf)

\*\* SELECT "POPULATION TYPE" FROM: GENERAL, ELDERLY, DISABLED, ELDERLY/DISABLED, OTHER

If “Population Type” is “Other” please describe:

**ii Planned Public Housing Units to be Removed**

Public housing units that the MTW PHA anticipates will be removed during the Plan Year. VHA plans to convert public housing through streamlined voluntary conversion and pursue Faircloth to RAD for up to 363 units before closing VHA’s Public Housing ACC.

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
Caples Terrace WA008519	28	Voluntary Conversion to PBV to close-out Public Housing
The Elwood WA008520	46	Voluntary Conversion to PBV to close-out Public Housing
Englund Manor WA008000516	29	Voluntary Conversion to PBV to close-out Public Housing
The Meridian WA008000521	46	Voluntary Conversion to PBV to close-out Public Housing
Tenny Creek WA008000517	40	Voluntary Conversion to PBV to close-out Public Housing
<b>TOTAL: Public Housing Units to be Removed in the Plan Year</b>	<b>189</b>	

**iii Planned New Project Based Vouchers**

Tenant-based vouchers that the MTW PHA anticipates project-basing for the first time during the Plan Year. These include only those in which at least an Agreement to enter into a Housing Assistance Payment (AHAP) will be in place by the end of the Plan Year. The following property residents will receive a tenant protection voucher through the streamline conversion plan. Residents will be permitted to remain in the unit with their TPV or if they agree to a conversion of their TPV to PBV. Ownership of the properties and population served will remain unchanged. There will be no impact to the neighborhood or number of affordable units in the community as a result of the subsidy conversion. As tenants with TPV voluntarily vacate, the units will be added to the PBV HAP utilizing VHA’s ability to PBV available vouchers in VHA related properties.

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD	DESCRIPTION OF PROJECT
Caples Terrace	28 Maximum	No	Conversion of Public Housing
The Elwood	46 Maximum	No	Conversion of Public Housing
Englund Manor	29 Maximum	No	Conversion of Public Housing
The Meridian	46 Maximum	No	Conversion of Public Housing
Tenny Creek	40 Maximum	No	Conversion of Public Housing
Lincoln Place 2	40 Maximum	No	New Construction Supportive Housing
<b>TOTAL:</b>	<b>229</b>		



PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD	DESCRIPTION OF PROJECT
PLANNED NEW PROJECT BASED UNITS IN PLAN YEAR			

**iv Existing Project Based Vouchers**

Tenant-based vouchers that the MTW PHA is currently project basing in the Plan Year. These include only those in which at least an AHAP is already in place at the beginning of the Plan Year. Select one of the following to indicate the Planned Status by the end of the Plan Year: “Committed,” “Leased,” or “Issued.” In column three, indicate whether the unit is included in RAD.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Allegro Pointe	23	Leased	Yes	49 Unit Mixed Income
Arbor Ridge	53	Leased	Yes (30)	60 unit assisted living, partial RAD transfer
Aurora Place	13	Leased	No	Owned by 2 <sup>nd</sup> Step
Camas Ridge	8	Leased	No	A 51-unit market rate project
Cascadia Village	6	Leased	No	51-unit LIHTC owned by Reach CDC
Central Park Place	30	Leased	No	30 VASH PBV in 124-unit SRO
Columbia Heights/Mercy Peace Health	17	Leased	No	69 units. Partnership between Mercy Housing Northwest and Peace Health Hospitals
Freedom’s Path	40	Leased	No	40 VASH PBV in 50-unit building
Fruit Valley	18	Leased	No	Previously public housing
Ft. Vancouver Terrace	13	Leased	No	HUD Conversion of Multifamily Property
Isabella Court	10	Leased	No	49-unit LIHTC, Reach CDC
Isabella II	30	Leased	No	49-unit LIHTC, Reach CDC
Kauffman Townhomes	10	Leased	No	10-unit project owned by 2 <sup>nd</sup> Step
Lainie’s Crossing	39	Leased	Yes	39 Units, RAD Transfer
Lincoln Place	30	Leased	No	30 unit site for chronic homeless
The Meadows	23	Leased	No	30-unit LIHTC, 2 <sup>nd</sup> Step Housing
Meriwether Place	23	Leased	No	30-unit LIHTC, CNPH
The Mews	3	Leased	No	24-unit LIHTC owned by Reach CDC
Mill Creek	12	Leased	Yes	50-unit LIHTC, RAD transfer
Mill Creek	42	Leased	No	78 unit LIHTC, Senior and Family
Nám’u qas	30	Leased	Yes	RAD transfer
Neals Lane	8	Leased	No	8 units. Homeless families.
The Pacific	8	Leased	No	18-unit behavioral health, Housing Initiative
Rhododendron Place	23	Leased	No	30-unit LIHTC, CNPH
Skyline Crest	90	Leased	No	Previously public housing
Skyline Crest	48	Leased	Yes	RAD portion of previous public housing
Smith Tower	3	Leased	No	170 units, owned by Mid-Columbia
Van Vista	95	Leased	No	95 units, previously public housing
VHA Apartment Homes	30	Leased	Yes	Scattered small complexes
Vista Court	76	Leased	No	76-unit senior building

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
<b>TOTAL: PLANNED EXISTING PROJECT-BASED VOUCHERS</b>	854			

**v Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year**

Examples of the types of other changes can include (but are not limited to) units held off-line due to relocation or substantial rehabilitation, local, non-traditional units to be acquired/developed, etc.

PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR
VHA will transfer the remaining 30 RAD units at VHA Apartment Homes to properties to be determined in 2024.

**vi General Description of All Planned Capital Expenditures During the Plan Year**

Narrative general description of all planned capital expenditures of MTW funds during the Plan Year.

GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR
<ul style="list-style-type: none"> <li>• \$100,000 for exterior improvement renovation at VHA Townhomes.</li> <li>• \$250,000 for safety and security upgrades at The Meridian, The Pacific, and The Elwood.</li> <li>• Approximately \$50,000 per project for rehab work at Walnut Grove, Highland Park, Forest Ridge, Weaver Creek, and Wisteria Manor.</li> <li>• \$100,000 for new construction at Laurel Manor.</li> <li>• \$500,000 for new construction at Lincoln Place II.</li> <li>• \$200,000 for exterior rehab construction contracts at Mill Creek.</li> <li>• VHA also has several potential acquisitions currently under negotiation, which if successful will require the use of DISPO funds.</li> </ul>

## LEASING INFORMATION

**i Planned Number of Households Served**

Snapshot and unit month information on the number of households the MTW PHA plans to serve at the end of the Plan Year.

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLD TO BE SERVED**
MTW Public Housing Units Leased	378	32
MTW Housing Choice Vouchers (HCV) Utilized	24186	2016
Local, Non-Traditional: Tenant-Based^	1200	100
Local, Non-Traditional: Property-Based^	4272	356

Local, Non-Traditional: Homeownership <sup>^</sup>	0	0
<b>PLANNED TOTAL HOUSEHOLDS SERVED:</b>	<b>30,036</b>	<b>2503</b>

\* “PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED” IS THE TOTAL NUMBER OF MONTHS THE MTW PHA PLANS TO HAVE LEASED/OCCUPIED IN EACH CATEGORY THROUGHOUT THE FULL PLAN YEAR.

\*\* “PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED” IS CALCULATED BY DIVIDING THE “PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED” BY THE NUMBER OF MONTHS IN THE PLAN YEAR.

<sup>^</sup> IN INSTANCES WHEN A LOCAL, NON-TRADITIONAL PROGRAM PROVIDES A CERTAIN SUBSIDY LEVEL BUT DOES NOT SPECIFY A NUMBER OF UNITS/HOUSEHOLDS TO BE SERVED, THE MTW PHA SHOULD ESTIMATE THE NUMBER OF HOUSEHOLDS TO BE SERVED.

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Property-Based	Shelter Beds/2021 Proposed 2021-01	2364	197
Property –Based	LIHTC Rent Buy Down/ 2021-02	1500	125
Property-Based	Market Unit Rent Buy Down/2015-01	408	34
Tenant Based	Transitional Housing Programs/ 2014-04	1200	100
Homeownership	N/A	0	0

\* The sum of the figures provided should match the totals provided for each local, non-traditional categories in the previous table. Figures should be given by individual activity. Multiple entries may be made for each category, if applicable.

**ii Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing**

Discussions of any anticipated issues and solutions in the MTW housing programs listed.

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	PH figures anticipate conversion by end of February 2024
MTW Housing Choice Voucher	HCV figures assume tenants from PH conversion will lease immediately.
Local, Non-Traditional	Figures provided are based on MOUs in place.

## WAITING LIST INFORMATION

**i Waiting List Information Anticipated**

SNAPSHOT INFORMATION OF WAITING LIST DATA AS ANTICIPATED AT THE BEGINNING OF THE PLAN YEAR. THE “DESCRIPTION” COLUMN SHOULD DETAIL THE STRUCTURE OF THE WAITING LIST AND THE POPULATION(S) SERVED.

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
Housing Choice Voucher	Tenant-Based Voucher	4339	Partially Open	NA
Allegro Point	PBV Site	0	Open	Yes
Aurora Place	PBV Site	4749	Closed	No
Camas Ridge	PBV Site	9099	Closed	No
Caples Terrace	Public Housing Site	47	Partially Open	NA
Columbia Heights	PBV Site	1238	Closed	No
Englund Manor	Public Housing Site	1051	Closed	No
Fort Vancouver Terrace	PBV Site	3897	Open	NA
Fruit Valley	PBV Site	4795	Closed	No
Isabella Court	PBV Site	5193	Closed	No
Isabella Court 2	PBV Site	0	Open	No
Kauffman Townhomes	PBV Site	2695	Closed	No
Lainie's Crossing	PBV Site	568	Closed	No
The Meadows	PBV Site	10072	Closed	No
Meriwether Place	PBV Site	2	Partially Open	NA
Mill Creek	PBV Site	9583	Closed	No
Nám'u qas	PBV Site	1	Partially Open	NA
Neals Lane	PBV Site	1719	Closed	NO
The Pacific	PBV Site	2	Partially Open	NA
Rhododendron Place	PBV Site	40	Partially Open	NA
Skyline Crest	PBV Site	9706	Closed	No
VHA Apartment Homes	PBV Site	8687	Closed	No
Vista Court	PBV Site	2215	Open	NA

Please describe any duplication of applicants across waiting lists: Applicants can apply to multiple waiting lists. 77% of applicants applied to more than one waiting list.

**ii Planned Changes to Waiting List in the Plan Year**

Please describe any anticipated changes to the organizational structure or policies of the waiting list(s), including any opening or closing of a waiting list, during the Plan Year.

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
None	None

## SECTION III: PROPOSED MTW ACTIVITIES

### ACTIVITY 2015-01: RENT BUY-DOWN LOCAL SUBSIDY PROGRAM - AMENDED

#### i. ACTIVITY DESCRIPTION

This activity was first approved in the FY2015 Plan Year. The original project where this activity was going to be utilized did not happen and this activity was not implemented until FY2020.

This amendment provides for the VHA to negotiate the buy-down amount with the property owners and allows for buy-downs in properties that may already be affordable to people at 50% AMI but not affordable to the residents of the property.

This activity allows the VHA to operate a local program that “buys down” rents at non-subsidized apartments so that the units become affordable for, and only available to, households at or below 50% of the Area Median Income (AMI). Participating properties experience higher occupancy and demand for their units, and low-income households have more affordable units available in their community.

Interested property owners may apply to participate via the open Notice of Funding Availability (NOFA)\* available on VHA’s website. If selected, an owner receives funds from the VHA to reduce apartment rents to an affordable level for eligible tenants. To be considered affordable, bought-down tenant rents must be equal to or lower than LIHTC rents for 50% AMI.

Qualified households must meet income eligibility standards and units must meet HQS/NSPIRE standards. VHA periodically selects units for audit to verify tenant and unit eligibility. Owners are also required to certify their compliance with all applicable civil rights laws and regulations.

Consideration for property selection will be based on the current rents, condition and location of proposed projects, and the owner’s willingness to negotiate more inclusive screening criteria for low-income applicants. The amount of the buy-down will be an amount negotiated with the ownership representative.

*\*The required competitive bidding process is waived when VHA is buying down units in a property owned by the VHA or a closely affiliated organization.*

#### Relation to Statutory Objectives

This activity will increase housing choice for low-income families.

#### Impact on Statutory Objectives

VHA anticipates implementing this activity as soon as it is approved.

#### ii. ACTIVITY METRICS INFORMATION

HC #1: ADDITIONAL UNITS OF HOUSING MADE AVAILABLE

UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0	100		

HC #5: INCREASE IN RESIDENT MOBILITY				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Number of households able to move to a better unit and/or neighborhood of opportunity* as a result of the activity (increase).	0	100		

\*Neighborhood of opportunity is defined as an area whose poverty rate falls below 10 percent (for metropolitan areas) or 15 percent (for nonmetropolitan areas)

**iii. COST IMPLICATIONS**

VHA anticipates a continued positive cost implication with this activity by keeping the contribution per bed/room below average HAP. Surplus funds will be utilized to support other MTW subsidies and programs.

**iv. NEED/JUSTIFICATION FOR MTW FLEXIBILITY**

This activity is authorized under the Use of Funds Amendment to Attachment D of the Amended and Restated MTW Agreement. This authorization is required because this rental subsidy program is outside of Section 8 and Section 9 of the 1937 Housing Act. In addition, VHA will comply with the requirements in PIH Notice 2011-45, Parameters for Local Non-Traditional Activities under the Moving to Work Demonstration Program.

**ACTIVITY 2021-02 LOCAL NON-TRADITIONAL: RENT BUY DOWN IN LIHTC UNITS - AMENDED**

**i. ACTIVITY DESCRIPTION**

This activity was approved in an amendment to the 2021 MTW Annual Plan, was implemented in 2021, and amended in 2023.

This amendment adjusts the target population for this activity to include households with income under 60% AMI – rather than 50% AMI – to allow more low-income families to be supported under the activity.

This local non-traditional program “buys down” rents in Low Income Housing Tax Credit Units (LIHTC). The target population for this activity is households with income under 60% AMI for whom even Tax Credit rents are unaffordable. VHA buys down rents by paying to the LIHTC property a monthly amount determined by agreement between the PHA and the LIHTC property. The agreed amount is dependent on both available funds and the needs of the property in serving low-income households.

Participating properties experience higher occupancy and demand for their units, and low-income households have more affordable units available in their community.

Interested LIHTC properties may apply to participate via the open Notice of Funding Availability (NOFA)\* available on VHA’s website. If selected, the tax credit property receives funds from the VHA to reduce apartment rents to an affordable level for eligible tenants. To be considered affordable, bought-down tenant rents must be equal to or lower than the LIHTC rents for 60% AMI.

Qualified households must meet income eligibility standards and units must meet HQS/NSPIRE standards. VHA periodically selects units for audit to verify tenant and unit eligibility. Property owners are also required to certify their compliance with all applicable civil rights laws and regulations.

Consideration for property selection will be based on the current rents, condition and location of proposed projects, and the owner’s willingness to negotiate more inclusive screening criteria for low-income applicants.

*\*The required competitive bidding process is waived when VHA is buying down units in a property owned by the VHA or a closely affiliated organization.*

**Relation to Statutory Objectives**

This activity meets the statutory objective of increasing housing choice by ensuring that tenants with incomes as low as zero dollars are able to sustain housing in LIHTC units. This also provides housing subsidy at a lesser cost than HCV, allowing VHA to serve more households.

**Implementation**

VHA anticipates implementing this activity as soon as it is approved.

**ii. ACTIVITY METRICS INFORMATION**

CE #6: REDUCING PER UNIT SUBSIDY COSTS FOR PARTICIPATING HOUSEHOLDS				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Average amount of Section 8 and/or 9 subsidy (or local, non-traditional subsidy) per household affected by this policy in dollars (decrease).	\$764	\$500		

HC #1: ADDITIONAL UNITS OF HOUSING MADE AVAILABLE				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	0	14		

HC #2: UNITS OF HOUSING PRESERVED				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase). If units reach a specific type of household, give that type in this box.	0	14		

**iii. COST IMPLICATIONS**

VHA anticipates a continued positive cost implication with this activity by keeping the contribution per bed/room below average HAP. Surplus funds will be utilized to support other MTW subsidies and programs.

**iv. NEED/JUSTIFICATION FOR MTW FLEXIBILITY**

This activity is authorized under the Use of Funds Amendment to Attachment D of the Amended and Restated MTW Agreement. This authorization is required because this rental subsidy program is outside of Section 8 and Section 9 of the 1937 Housing Act. In addition, VHA will comply with the requirements in PIH Notice 2011-45, Parameters for Local Non-Traditional Activities under the Moving to Work Demonstration Program.

**SECTION IV: APPROVED MTW ACTIVITIES**

**Implemented Activities**

**ACTIVITY 2023-01 USE OF MTW FUNDS FOR DEVELOPMENT – LOCAL NON-TRADITIONAL**

- i This activity was approved in an Amendment to the 2023 MTW Annual Plan.
- ii Through this activity, VHA intends to commit MTW funds to acquire, renovate, or build local, non-traditional affordable units. Funds may be used directly by VHA or may be granted or loaned to another entity that will acquire, renovate or develop and own the local, non-traditional affordable units. Such units are made available in the project, by regulatory and operating agreement, master contract, individual lease, or equity interest.
- iii This activity will follow the general parameters of PIH Notice 2011-45, as well as those specific to Housing Development Programs Funds will be used only to develop affordable units (for families with income below 80% AMI). Developments will remain affordable for 30 years unless MTW funds are used only as a loan. In the case of a loan, the units must remain affordable at least until the loan is repaid but maybe longer by agreement. VHA will record a use agreement or covenant on any property developed using MTW funds. Development of local non-traditional housing under this activity will also comply with requirements for



Environmental Review, Site and Neighborhood Standards, Subsidy Layering Review, and any applicable Section 18 disposition requirements.

- iv There are no non-significant changes planned for 2024.
- v There are no planned changes or modifications to the metrics for this activity in 2024.
- vi There are no planned significant changes in 2024.

## **ACTIVITY 2021-01 LOCAL NON-TRADITIONAL: FINANCIAL SUPPORT OF SHELTER BEDS**

- i. This activity was approved in an amendment to the 2021 MTW Annual Plan and was implemented in 2021.
- ii. This activity provides operational support for homeless shelters, through payment directly to the operator of the shelter. Tenants served are homeless individuals or families under 80% AMI. The amount of subsidy per shelter is determined by agreement with the shelter, dependent on other resources and whether the shelter is serving families or single individuals.
- iii. There are no non-significant changes planned for 2024.
- iv. There are no planned changes or modifications to the metrics for this activity in 2024.
- v. There are no planned significant changes in 2024.

## **ACTIVITY 2020-01 EXCLUSION OF CHILDCARE WAGES**

- i. This activity was approved in an amendment to the 2020 MTW Annual Plan and will be implemented in 2021.
- ii. This activity will exclude income from new employment in the childcare industry (either as an employee or as a state licensed childcare provider). Such income will be considered earned income but will be excluded as countable income. The exclusion will be 100% in the first twelve months. In the second twelve months, the exclusion will be 50%.The maximum exclusion will be 24 months. Breaks in employment will not extend the length of the exclusion. Although income is excluded from calculation of TTP, participants are still subject to Activity 2013-01: Minimum Earned Income Rent Reform. Earnings excluded under this Activity (2020-01) will be counted as earnings under 2013-01.
- iii. There are no non-significant changes planned for 2024.
- iv. There are no planned changes or modifications to the metrics for this activity in 2024.
- v. There are no planned significant changes in 2024.

## **ACTIVITY 2018-02: LOCAL PAYMENT STANDARDS**

- i. This activity was approved in an amendment to the FY2018 MTW Annual Plan and was implemented January 1, 2018. It has not been amended since initial approval.
- ii. This activity allows the VHA to set payment standards outside of the normal range allowed under regulation. VHA monitors rent burdens and other factors such as voucher success

rates, lease-up time, market rents, vacancy rates and funding availability, and set payment standards within a range between 80 and 120 percent of the HUD published FMR. This activity will be ongoing during the Plan year.

- iii. There are no non-significant changes planned for 2024.
- iv. There are no planned changes or modifications to the metrics for this activity in 2024.
- v. There are no planned significant changes in 2024.

## **ACTIVITY 2016-02: LOCAL BLENDED SUBSIDY**

- i. This activity was approved in the FY2016 MTW Annual Plan and was implemented in 2020. It was last amended in the FY2020 MTW Plan Amendment to add The Meridian as a project to receive blended subsidy.
- ii. This activity uses a blend of funding from both the Public Housing and Section 8 Voucher Programs to provide operating subsidy in order to develop mixed-finance public housing projects. Projects utilizing blended subsidy will be developed under the regulations found at 24 CFR § 905 and must be specifically approved by HUD separate from any approval of the Annual MTW Plan. For the purpose of regulatory compliance, these units are considered public housing. The length of time the project receives blended subsidy is dependent upon VHA remaining under an MTW Agreement (currently extended to 2028). If VHA no longer has MTW authority, any units under the blended subsidy will no longer receive the operating subsidy. VHA will obtain specific approval from any financial partner or investor in a property utilizing this blended subsidy in writing. VHA is developing, and has been approved for, five projects under this activity: Tenny Creek, Englund Manor, The Elwood, the Meridian, and Caples Terrace.
- iii. There are no non-significant changes planned for 2024.
- iv. There are no planned changes or modifications to the metrics for this activity in 2024.
- v. There are no planned significant changes in 2024.

## **ACTIVITY 2015-02: ALTERNATIVE TTP CALCULATION (35%)**

- i. This activity was approved in the FY2015 MTW Annual Plan and was implemented on November 1, 2015. It was changed in an amendment to the FY2017 Annual Plan.
- ii. This MTW activity changes the way in which the Total Tenant Payment (TTP) is calculated when determining tenant rent and housing assistance in the HCV and Public Housing programs. The TTP is normally determined by taking the highest of: 1) 30% of the household's monthly-adjusted income; 2) 10% of the household's monthly income; or 3) The minimum rent of \$50. Under this activity, VHA has changed the percentage of adjusted monthly income. When first implemented 33% of adjusted income was used instead of 30%. Effective January 1, 2018, the percentage was changed to 35%. Some properties (currently the Public Housing sites Englund Manor and Tenny Creek) may be exempt from this activity due to a conflict with a State of Washington requirement. Under this activity, households with a tenant-based voucher can have a maximum family share of up to 40% of the family's

adjusted monthly income at initial occupancy. This activity will be ongoing during the Plan year.

- iii. There are no non-significant changes planned for 2024.
- iv. There are no planned changes or modifications to the metrics for this activity in 2024.
- v. There are no planned significant changes in 2024.

## **ACTIVITY 2014-06 ALTERNATIVE PROJECT-BASED VOUCHER PROGRAM**

- i. This activity was approved in amendment to the FY2014 MTW Annual Plan and was implemented on August 6, 2014. It was resubmitted for approval in the FY2017 Annual Plan to allow VHA to change the limit on project basing from 20% to 30% of the HCV program. The activity was amended in the 2020 MTW Annual Plan Amendment to waive the requirement of an independent entity to approve initial and renewal HAP contract terms. In 2022, VHA added Quality Control Inspections to this activity. 5% of all completed inspections completed each year will be re-inspected by an independent third party as a Quality Control measure.
- ii. This activity consolidated some previous MTW activities and added some new policies regarding Project-Based Vouchers (PBV). VHA's Alternative PBV program utilizes the existing regulations under 24 CFR § 983 with the following exemptions:
  - The required competitive bidding process is waived when VHA is placing PBV in a project owned by the VHA or a closely affiliated organization.
  - The VHA will not generally provide move vouchers to residents of PBV units. This rule does not apply to PBV project converted under RAD. In addition, there are these exceptions:
    - i. In case of overcrowded or under-occupied units where VHA does not anticipate an appropriate sized PBV becoming available.
    - ii. VHA will allow a move voucher when requested in non-RAD PBV projects that include services and when the tenant has resided there for at least two years, no longer has a need for the provided services, and has a recommendation from the service provider.
  - The requirement that tenants be selected from a waiting list may be waived for projects where participation in specific services is a requirement of residency.
  - VHA may allow up to 100% of the units in a project to be PBV even when the project is not exclusively for elderly or disabled households or when no services are required.
  - VHA may perform HQS inspections and to make determinations of ongoing rent reasonableness in VHA owned units. (see also Activity 2011-05)
  - VHA will approve initial and renewal HAP contract terms without approval by an independent entity.
  - VHA may project-base up to 30% of its HCV program.

This activity will be ongoing during the Plan year.

- iii. There are no non-significant changes to this activity in 2024
- iv. There are no planned changes or modifications to the metrics for this activity in 2024.
- v. There are no planned significant changes in 2024.

## **ACTIVITY 2014-05: INTERIM VERIFICATION POLICY**

- i. This activity was approved under an amendment to the FY2014 MTW Annual Plan and was implemented on September 1, 2014. It has not been amended since the initial approval.
- ii. This activity changes the way interim reexaminations for changes in family income and composition are verified and their effective dates. Households may still request an interim reexamination at any time but the responsibility to obtain verification is changed from VHA to the participant. Verification of the income or family change that they are reporting must be provided prior to any resulting change in tenant rent becoming effective. If the request *and* the verification is received before the 15<sup>th</sup> of the month, any resulting change in tenant rent will be effective the first of the following month. The VHA still obtains verification for initial eligibility reexaminations and for regular/annual reexaminations.
- iii. There are no non-significant changes planned for 2024.
- iv. There are no planned changes or modifications to the metrics for this activity in 2024.
- v. There are no planned significant changes in 2024.

## **ACTIVITY 2014-04: LOCAL NON-TRADITIONAL: TRANSITIONAL HOUSING**

- i. This activity was approved under an amendment to the FY2014 MTW Annual Plan and was implemented on July 1, 2014. It was amended in 2021.
- ii. The Transitional Housing Program supports transitional housing for homeless individuals and families with income below 30% of the Area Median Income (AMI). Transitional Housing providers receive financial assistance to support the cost of rent when they have funds to leverage that are not adequate to provide housing assistance. The amount of subsidy per shelter is determined by agreement with the provider. Assistance may be provided in scattered sites, or property owned by the transitional housing provider. Transitional housing providers will provide services to support self-sufficiency. Participation of individual households will be limited by the sponsoring agency's rules. Income eligibility will be determined following the VHA's HCV eligibility with a 30% limit. VHA may commit additional funding in the future, if a sponsoring agency seeks support and the cost per household can be held under VHA's average HAP cost in the HCV program.
- iii. There are no non-significant changes planned for 2024.
- iv. There are no planned changes or modifications to the metrics for this activity in 2024.
- v. There are no planned significant changes in 2024.

## **ACTIVITY 2014-01: MODIFIED FSS ESCROW CALCULATION**

- i. This activity was approved in the FY2014 MTW Annual Plan and was implemented on January 1, 2014. It has not been amended since the initial approval.
- ii. This activity modifies the way escrow is calculated in the full, five-year, Family Self-Sufficiency Program (FSS). VHA's method under MTW has two parts. The first part is a monthly deposit to a participant's escrow account when they have increased earned income that results in a

Total Tenant Payment (TTP) over the baseline set when they join FSS. The baseline is a fixed amount set at \$450 for all new participants regardless of their income. The second part is that VHA pays a specific amount to a participant's escrow account based on specific achievements. Some of these "pay points" result in an immediate deposit to the escrow account while others are not calculated and paid until a successful program graduation.

Examples of achievements that result in escrow deposits include:

- a. Completion of core GOALS classes or entire curriculum
- b. Completion of other educational goals
- c. Obtaining and maintaining employment
- d. Increase in credit score
- e. Establishing and maintaining a saving account
- f. Completion of other ITSP goals

The maximum allowable that a participant may earn under pay points is \$6,000. There is no limit set on the amount a participant may earn under the increased earned income part of the escrow calculation. Under this new system, FSS participants are only eligible for one interim withdrawal from their escrow account during their program participation. As an additional benefit for FUP- or FYI-eligible youth participants, VHA will extend the term of their voucher assistance up to the length of their FSS participation, not to exceed an additional 24 months. This activity will be ongoing during the Plan year.

- v. There is one non-significant change planned for 2024, allowing for voucher assistance extension for FUP- and FYI-eligible youth participants.
- vi. There are no planned changes or modifications to the metrics for this activity in 2024.
- vii. There are no planned significant changes in 2024.

## ACTIVITY 2013-01: MINIMUM EARNED INCOME RENT REFORM

- i This activity was initially approved in the FY2013 MTW Annual Plan. It was re-proposed in the FY2017 MTW Annual Plan to increase the amount of the annual minimum income from \$9,000 to \$10,000. Later, it was re-proposed in amendment to the FY2017 Plan and changed to link the amount of the minimum income directly to the Washington State minimum wage. It was again re-proposed in the FY2018 MTW Annual Plan to change from a minimum income to a minimum *earned* income. Finally, in 2023 the activity was amended to establish categories of exemption, and refine the definition of earned income.
- ii This activity utilizes a minimum earned income when calculating rent for any household that includes one or more work-able family members except as exempted below.

**Workable Definition:** A family member who is

- 18 or more years of age and under 62 years of age.
- Not a dependent of the head of household. A dependent is a child under 18, or a person of any age (except the Head of Household, Spouse, or Co-Head) who is disabled or a full time student.
- Not disabled.
- Not the caretaker for a household member who is disabled.
- See also, Temporary Exemptions to Workable.

**Earned Income Definition.** For the purposes of this policy, the following will be counted as earned income to determine if the Minimum Earned Income requirement has been met. This definition does not alter the definition of included/excluded income used to determine a family's subsidy amount:

- Income from employment.
- Benefits resulting from previous employment: i.e. Unemployment compensation, Labor & Industries insurance benefits.

**Calculation of Minimum Earned Income:** The household Minimum Earned Income responsibility will equal the number of workable family members multiplied by the Minimum Wage in Clark County multiplied by 20 hours per week. All earned income in the household will offset the family's Minimum Earned Income responsibility. If the household's total earned income is greater than the Minimum Earned Income responsibility, the household is not affected by this policy. Any Minimum Earned Income will be added to the household's other countable income when calculating rental subsidy.

**Temporary Exemptions to Workable:** The following exemptions require the family to provide documentation.

- **Tenant Choice.** Each family will have 6 months of exemption to use by choice when they make a written request. This exemption can be used in two month periods during which all family members will be exempt from Minimum Earned Income. Once all six months are used, no further Tenant Choice exemption can be used.
- **Student Exemption for Head of Household, Spouse, or Co-head.** Individuals who are not dependents and are pursuing an education can be individually exempted from the Minimum Earned Income policy. To qualify, the family member must provide documentation that the family member is enrolled full time (as defined by the school) at an accredited educational institution.
  - Must provide VHA documentation of having satisfactorily completed courses to maintain the exemption. Documentation must be received within 30 days of the end of the school term (quarter or semester).
  - Not providing documentation and/or not making satisfactory progress during one or more school terms will disqualify the family member from the exemption for the same number of terms.
  - This exemption will not be given for longer than four years total to each family member. No more than two years will be given for students at a Community College or Vocational School. Students enrolled in Graduate programs who have already used four years of exemption may apply for a separate Financial Hardship Exemption.
- **Exemption for Pregnancy:** A birthing parent in their last trimester of pregnancy may request to be exempt by providing documentation of their due date from a health care professional.
- **Exemption for the Caregiver of a Child from birth to 3 years old:** One adult family member may request to be exempt to care for one or more children under 3 years old living in the household. Only one family member at a time may be exempt to care for a child/children. The household cannot be receiving a childcare expense deduction for the child/children.



- Exemption to care for a Disabled family member in the household.
  - The workable family member must provide a letter from the disabled person's healthcare professional stating that the disabled person needs enough care that their caregiver cannot work 20 hours per week outside the home.
  - Only one family member may receive an exemption to be an individual disabled person's caregiver.
  - The disabled person may not also have a live-in aide.

**Financial Hardship Exemptions:** VHA recognizes that additional circumstances may make the policy a hardship for workable family members. These families may request a Financial Hardship under the VHA Hardship policy. See Appendix C

- iii There are no non-significant changes planned for 2024.
- iv There are no planned changes or modifications to the metrics for this activity in 2024.
- v There are no planned significant changes in 2024.

### **ACTIVITY 2011-05: VHA STAFF TO PERFORM HQS AND RENT REASONABLENESS ON VHA OWNED PROPERTIES.**

- i. This activity was approved in the FY2011 MTW Annual Plan and was implemented on January 1, 2011. It has not been amended since the initial approval. In 2022, VHA added Quality Control Inspections to this activity. 5% of all completed inspections completed each year will be re-inspected by an independent third party as a Quality Control measure.
- ii. This MTW activity allows the VHA to have Section 8 HCV department staff perform HQS inspections and determine rent reasonableness for units owned by the VHA or owned by an entity substantially controlled by the VHA such as a tax credit property. This authority creates substantial savings compared to what the VHA was being charged by contracted inspectors.
- iii. There are no non-significant changes planned for 2024.
- iv. There are no planned changes or modifications to the metrics for this activity in 2024.
- v. There are no planned significant changes in 2024.

### **ACTIVITY 2009-19: SPECIAL ADMISSION PROCEDURE FOR ASSISTED LIVING FACILITY**

- i. This activity was approved in an amendment to the FY2009 MTW Annual Plan and was implemented on September 1, 2009. It has not been amended since the initial approval.
- ii. This MTW activity allows tenant selection to be made by the administrator of the assisted living facility rather than utilizing a waiting list. VHA's Assisted Living programs regularly receive inquiries regarding the availability of a unit. If a unit is not immediately available, the agency or person making the inquiry continues their search elsewhere as waiting on a list for a unit with assisted living services is not a desirable option. Once a vacancy is anticipated then the next inquiry will be notified, and the vacancy filled. The waiver of the waiting list requirement allows for the unique needs of the assisted living population and their need for services.
- iii. There are no non-significant changes planned for 2024.

- iv. There are no planned changes or modifications to the metrics for this activity in 2024.
- v. There are no planned significant changes in 2024.

### **ACTIVITY 2009-15: OWNERS RESTRICTED TO ANNUAL RENT INCREASES**

- i. This activity was approved in an amendment to the FY2009 MTW Annual Plan and was implemented on September 1, 2009. It has not been amended since the initial approval.
- ii. Under this MTW policy, owners in the Housing Choice Voucher program are restricted to a single rent increase each year.
- iii. There are no non-significant changes planned for 2024.
- iv. There are no planned changes or modifications to the metrics for this activity in 2024.
- v. There are no planned significant changes in 2024.

### **ACTIVITY 2009-10: REPLACEMENT OF MEDICAL EXPENSE DEDUCTION**

- i. This activity was approved in an amendment to the FY2009 MTW Annual Plan and was implemented on November 5, 2009. It has not been amended since the initial approval.
- ii. Under this activity, the VHA has eliminated individual calculation and verification of medical expenses for Elderly and Disabled designated families, replacing the deduction with an increase in the Elderly/Disabled deduction from \$400 to \$700.
- iii. There are no non-significant changes planned for 2024.
- iv. There are no planned changes or modifications to the metrics for this activity in 2024.
- v. There are no planned significant changes in 2024.

### **ACTIVITY 2009-03: NO VERIFICATION OF ASSETS LESS THAN \$50,000**

- i. This activity was approved in an amendment to the FY2009 MTW Annual Plan and was implemented on September 1, 2009. The dollar threshold was changed from \$5,000 to \$50,000 in an amendment to the FY2014 Annual Plan.
- ii. VHA does not obtain a verification of a reported asset if the reported value is less than \$50,000. This MTW activity saves VHA significant administrative funds by eliminating verifications on most assets and any income from those assets that has little or no effect on housing subsidy and/or tenant rent.
- iii. There are no non-significant changes planned for 2024.
- iv. There are no planned changes or modifications to the metrics for this activity in 2024.
- v. There are no planned significant changes in 2024.

### **ACTIVITY 2007-02: ALTERNATE REQUIRED REEXAMINATION SCHEDULE**

- i. This activity was approved in the FY2007 MTW Annual Plan and was implemented on September 1, 2008. In an amendment to the FY2009, the policy was changed to the current schedule of triennial reexaminations for those on fixed income.



- ii. VHA identifies households with a fixed income and places them on a schedule to have a full reexamination every three years rather than annually. Fixed income means the household has no work-able members and the only household income is from sources such as Social Security, Supplemental Security Income (SSI), and/or pensions. Households that are not determined to have a fixed income are scheduled to have a reexamination 12 months after their last reexamination.
- iii. There are no non-significant changes planned for 2024.
- iv. There are no planned changes or modifications to the metrics for this activity in 2024.
- v. There are no planned significant changes in 2024.

## **Not Yet Implemented Activities**

VHA has no activities not yet implemented at this time.

## **C. Activities on Hold**

### **ACTIVITY 2009-13: RESET OF REQUIRED REEXAMINATION DATE AFTER INTERIM**

- i. This activity was approved in an amendment to the FY2009 MTW Annual Plan and was implemented on October 1, 2009. It has not been amended since the initial approval.
- ii. This MTW activity provides that the next required reexamination (AKA Annual Review) will be rescheduled at least 12 months after the effective date of an interim reexamination. An interim review for income or household composition change may reset the next required reexamination only once. This policy reduces the overall number of reexaminations required each year.
- iii. There are no non-significant changes planned for 2024.
- iv. There are no planned changes or modifications to the metrics for this activity in 2024.
- v. VHA plans to close this activity in the 2023 MTW Annual Report.

### **ACTIVITY 2009-08 ~ SIMPLIFIED UTILITY ALLOWANCE SCHEDULE - AMENDED**

- i. This activity was approved in an amendment to the FY2009 MTW Annual Plan and was implemented on September 24, 2009. It was amended in 2023 to be used only at leasing.
- ii. Over the years, it has become more common in Clark County for tenants to pay for water, sewer, and garbage service (WSG), either directly or through costs allocated across the property. During 2023, we noted that the percentage of new leases that required the tenant pay for water, sewer, and garbage has increased to 79%. Given the changes in utility responsibilities, VHA feels that this simplified utility allowance no longer serves the needs of VHA or our clients. VHA will end this activity in 2023 and follow the standard regulations.

The Simplified Utility Allowance adopts a schedule calculated from the standard estimated costs for a unit where the tenant is responsible for only the cost of electricity. For studio through 3 bedroom units, the standard schedule for a new or weatherized multi-family unit is

used. For larger units the standard schedule for a single family home is used. The Simplified Utility Allowance allows participants to know whether a prospective unit falls within their maximum rent range. This reduces the number of Request for Tenancy Approvals that have to be denied because they are too expensive, and reduces the frustration for participants and property owners when searching for units to lease. The Simplified Utility Allowance is only used in Tenant Based Vouchers.

- iii. There are no non-significant changes planned for 2024.
- iv. There are no planned changes or modifications to the metrics for this activity in 2024.
- v. VHA plans to conclude this activity with the 2023 Annual Report.

## D. Closed Out Activities

The following chart lists all closed out MTW activities:

MTW ACTIVITY NAME/NUMBER	PLAN YEAR APPROVED	PLAN YEAR IMPLEMENTED	PLAN YEAR CLOSED OUT	REASON CLOSED OUT
Family Self-Sufficiency Lite/2016-01	FY2016	FY2016	FY2022	Concluded
School Stability Subsidy Program/2013-02	FY2013	FY2015	FY2022	Concluded
Mandatory Participation in Services/2019-01	FY2019	FY2019	FY2021	Not Successful
Skyline Crest Campus of Learners/2010-02	FY2010	FY2010	FY2019	Concluded
Community Supported Self Reliance/2012-01	FY2012	FY2012	FY2018	Concluded
Time Limited Vouchers with Services/2008-01	FY2008	FY2008	FY2018	Concluded
Local Rent Subsidy Program/2014-03	FY2014	NA	FY2014	Never Implemented
Utility Allowance Lesser of Unit/Voucher/2014-02	FY2014	FY2014	FY2015	Adopted by HUD
Health Advocate Training Program/2013-05	FY2013	FY2013	FY2013	Concluded
Admin Fee for Owners in HCV Program/2013-04	FY2013	NA	FY2013	Withdrawn
Shelter Facilities Support/2013-03	FY2013	NA	FY2014	Never Implemented
Short Term Rental Assistance/2012-04	FY2012	FY2013	FY2016	Concluded
Home Sharing in HCV Program/2012-03	FY2012	FY2015	FY2016	Concluded
MTW Fund for Leveraging Housing/2012-02	FY2012	NA	FY2017	Never Implemented
Community Supported Self-Reliance/2012-01	FY2012	FY2012	FY2020	Concluded
"Floating Units" in PBV program/2011-02	FY2011	FY2012	FY2013	Concluded
Income Limits for New Public Housing/2011-01	FY2011	NA	FY2011	Never Implemented
Local Preference for Unsubsidized/2010-04	FY2010	FY2010	FY2015	Concluded
Community Involvement/2010-01	FY2010	FY2010	FY2013	Concluded
Local Preference for FSS Participation/2009-18	FY2009	FY2009	FY 2009	NOFA Requirement
Mandatory Self-Sufficiency Program/2009-17	FY2009	NA	FY 2009	Never Implemented
Renter Education Required for Applicants/2009-16	FY2009	FY2009	FY 2017	Concluded
Simplified Recertification Process/2009-14	FY2009	NA	FY 2009	Never Implemented
Limited Utility Allowance Payments/2009-09	FY2009	FY2009	FY 2013	Concluded
Alternate Inspection Schedule in HCV/2009-06	FY2009	FY2010	FY 2015	Adopted by HUD
Asset Based Initiative (IDA)/2009-04	FY2009	NA	FY2010	Never Implemented
Imputed TANF for Voluntary Closures/2009-02	FY2009	FY2009	FY 2013	Concluded
Pilot Rental Subsidy Project/2009-01	FY2009	NA	FY 2009	Never Implemented
Alternate HCV Homeownership Program/2008-02	FY2008	FY2010	FY 2011	Concluded
Time-Limited Vouchers Tied to Services/2008-01	FY2008	FY2008	FY2018	Concluded
Flat rent and Flat HCV Subsidy/2007-01	FY2007	NA	FY 2008	Never Implemented
Alternative Rent Reasonable Procedure/2004-01	FY2004	FY2004	FY 2009	Concluded
Escrow Accounts Capped at \$6000/2003-01	FY2003	FY2003	FY 2005	Concluded
"Request Line" Single Waiting List/2002-01	FY2002	FY2002	FY 2003	Concluded

\$480 Deduction for Child Support /2001-02	FY2001	FY2001	FY 2004	Concluded
Eight Percent Earned Income Deduction/2001-01	FY2001	FY2001	FY 2004	Concluded
No Earned Income Disallowance/1999-09	FY1999	FY2009	FY 2015	Concluded
No Flat Rent Option in Public Housing/1999-08	FY1999	FY2009	FY 2015	Concluded
Maximum Family Share 45% of Gross/1999-07	FY1999	FY2009	FY 2005	Concluded
Restrictions on HCV Port-Outs/1999-06	FY1999	FY2009	FY 2005	Concluded
All Households Eligible for Escrow /1999-05	FY1999	FY2009	FY 2005	Concluded
FSS Absorbed into MTW Self-Sufficiency/1999-04	FY1999	FY2009	FY 2005	Concluded
Five-Year Time Limit for Non Eld/Dis/1999-03	FY1999	FY2009	FY 2005	Concluded
Mandatory Self-Sufficiency Program/1999-02	FY1999	FY2009	FY 2005	Concluded
All HCV Port-Ins to be absorbed by VHA/1999-01	FY1999	FY2009	FY 2001	Concluded

## SECTION V: PLANNED APPLICATION OF MTW FUNDS

\* Due to timing of the Annual Plan preparation, these are preliminary 2024 numbers. Budget has not been finalized.

### PLANNED APPLICATION OF MTW FUNDS

#### i Estimated Sources of MTW Funds

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	-
70600	HUD PHA Operating Grants	25,205,662
70610	Capital Grants	-
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	1,876,273
71100+72000	Interest Income	-
71600	Gain or Loss on Sale of Capital Assets	-
71200+71300+71310+71400+71500	Other Income	6,220,394
<b>70000</b>	<b>TOTAL REVENUE</b>	<b>\$33,302,329</b>

#### ii Estimated Application of MTW Funds

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
9000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	2,868,617
91300+91310+92000	Management Fee Expense	175,874
91810	Allocated Overhead	-
92500 (92100+92200+92300+92400)	Total Tenant Services	102,960
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	-
93500+93700	Labor	-
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	-
95000 (95100+95200+95300+95500)	Total Protective Services	-
96100 (96110+96120+96130+96140)	Total insurance Premiums	6,583
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	-
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	-
97100+97200	Total Extraordinary Maintenance	-
97300+97350	HAP + HAP Portability-In	30,144,030
97400	Depreciation Expense	-
97500+97600+97700+97800	All Other Expenses	4264
<b>90000</b>	<b>TOTAL EXPENSES</b>	<b>\$33,302,329</b>

Description of any variance between Estimated Total Revenue and Estimate Total Expenses

No significant variance

**iii Description of Planned Application of MTW Funding Flexibility**

PLANNED APPLICATION OF MTW FUNDING FLEXIBILITY
<p>VHA will utilize MTW funding flexibility (including Section 8, Public Housing operating reserves, Capital Fund Grants, Replacement Housing Factor Funds, Demolition and Disposition Transitional Funds, and Disposition proceeds) for activities authorized in the MTW Agreement. Uses include capital needs rehabilitation, operating expenses, and construction, redevelopment costs at properties where VHA has an ownership interest, and development costs including acquisition or construction of affordable housing, as well as rental subsidies in Public Housing, Section 8 Voucher, and Local Non-Traditional programs.</p> <p>VHA will use the funding flexibility allowed under MTW to provide additional services for the people we house. Some of our resident services are under the umbrella of Bridgeview Housing. In addition to the grant-funded services of Family Self Sufficiency (FSS), MTW funds support the navigation and care coordination services at Bridgeview. These services support VHA's rent reform activities.</p>

VHA will use the funding flexibility to fund resident services at specific properties serving high needs populations such as Lincoln Place, The Pacific, The Elwood, The Meridian, Meriwether Place, Rhododendron Place, Caples Terrace, Nám'u qas, and Central Park Place.

VHA is using single fund flexibility to pay moving cost assistance for households that have been issued vouchers. VHA is also using single fund flexibility to pay MTW administrative costs and the HCV program administrative costs that are not covered by the administrative fee.

VHA plans to utilize single fund flexibility if we are approved to transfer existing RAD PBV units from their current location to a new site. The funds will be used to bring the contract rents up to a sustainable level at the transferred site.

**iv PLANNED APPLICATION OF PHA UNSPENT OPERATING FUND AND HCV FUNDING**

ORIGINAL FUNDING SOURCE	BEGINNING OF FY - UNSPENT BALANCES	PLANNED APPLICATION OF PHA UNSPENT FUNDS DURING FY
HCV HAP*	\$2,049,428	\$1,784,328
HCV Admin Fee	\$0	\$0
PH Operating Subsidy	\$0	\$0
<b>TOTAL:</b>	<b>\$</b>	<b>\$</b>

**DESCRIPTION OF PLANNED EXPENDITURE OF UNSPENT OPERATING FUND AND HCV FUNDING**

PH unspent funds will support MTW activities as outlined in Section iii. above

**v Local Asset Management Plan**

i. Is the MTW PHA allocating costs within statute?

Yes

ii. Is the MTW PHA implementing a local asset management plan (LAMP)?

No

iii. Has the MTW PHA provided a LAMP in the appendix?

NA

iv. If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan Year.

NA

vi Rental Assistance Demonstration (RAD) Participation

i Description of RAD Participation.

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION
The VHA is considering the use of Faircloth to RAD. Specific plans and properties are not confirmed at this time. .

- ii Has the MTW PHA submitted a RAD Significant Amendment in the appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval.

No

## SECTION VI: ADMINISTRATIVE

### A. Board Resolution and Certifications of Compliance

Copies of the VHA Board of Commissioners Resolution adopting the Plan and the MTW Certifications of Compliance are attached as Appendix A.

### B. Documentation of Public Process

The revised Plan was made available for public comment beginning on December 7, 2023, by notice in The Columbian and publication on VHA’s website [www.vhausa.org](http://www.vhausa.org). It was also provided to the RAB on December 6, 2023 for discussion and comment.

A Public Hearing was held on January 10, 2024. VHA staff Jamie Schau attended along with one current and two potential RAB members. There were no attendees from the general public. RAB members had general questions about the flexibilities MTW agencies have and how they differ from other PHAs, as well as suggestions for how to seek additional public input into Plans.

### C. Several comments were received via email from one member of the public, suggesting minor language edits for clarity as well as recommending Activity 2021-01 be broadened to include transitional and permanent housing providers serving those exiting homelessness and below 30% AMI. Comments were addressed noting that Activity 2014-04 and amended Activity 2015-01 account for both properties and tenants meeting the parameters mentioned. No additional comments were received via email, US mail, or phone. Planned and Ongoing Evaluations

VHA has selected Providence CORE to complete an analysis of the impact and effectiveness of activity 2013-01 Minimum Earned Income. Research is ongoing.

## **D. Lobbying Disclosures**

Signed copies of lobbying disclosures are attached as Appendix B.

## APPENDIX A: BOARD RESOLUTION AND CERTIFICATIONS OF COMPLIANCE

### HOUSING AUTHORITY OF THE CITY OF VANCOUVER

#### CLARK COUNTY WASHINGTON

#### RESOLUTION NO. 3526

#### RESOLUTION TO APPROVE THE AMENDED MOVING TO WORK ANNUAL PLAN FOR FISCAL YEAR 2024

**WHEREAS**, the Housing Authority of the City of Vancouver has entered into various contracts with the United States of America pertaining to the Housing Act of 1937, as amended; and

**WHEREAS**, the Department of Housing and Urban Development and the Housing Authority of the City of Vancouver have entered into a Moving to Work Demonstration Agreement as amended and restated on March 26, 2008; and

**WHEREAS**, the Moving to Work Agreement with the Department of Housing and Urban Development requires the submission of a Annual MTW Plan; and

**WHEREAS**, the Amendment to the Annual Plan for Fiscal Year 2024 has been prepared and made available for public comment for thirty days and a public hearing was held on January 10, 2024;

**NOW, THEREFORE, BE IT RESOLVED**, by the Board of Commissioners of the Housing Authority of the City of Vancouver, that:

1. The Board of Commissioners approves the Amended 2024 Moving to Work Annual Plan and authorizes the Chief Executive Officer to complete the Plan documents and submit the Plan to the Department of Housing and Urban Development, and to revise VHA policy to reflect the proposals in the Plan once HUD approval is obtained.
2. The Board of Commissioners certifies that the Public Hearing Requirement has been met and authorized the Chair of the Board to execute the attached Certifications of Compliance.

**ADOPTED** by the majority of members of the Board of Commissioners and signed by me in open session in authentication of its passage this 25th day of January 2024.

  
\_\_\_\_\_  
Joan Caley, Chair

ATTEST:

  
\_\_\_\_\_  
Andy Silver, Secretary-Treasurer



## 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 Annual Moving to Work Plan

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chair or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (01/01/2024), hereinafter referred to as "the Plan", 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 Plan and implementation thereof:

- (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
- (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 Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- (5) The Plan 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 Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies, and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15, which means that it will take meaningful actions to further the goals identified in its Analysis of Impediments to Fair Housing Choice(AI), Assessment of Fair Housing (AFH), and/or other fair housing planning documents conducted in accordance with the requirements of 24 CFR Part 5, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o), and will address impediments to fair housing choice identified in its AI, AFH, and/or other fair housing planning documents associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (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.
- (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 75.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.

form HUD 50900: Standard HUD Metrics (3/2021)

- (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 and implementing regulations at 49 CFR Part 24.
- (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 24 CFR 85.20 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 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- (23) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan 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 Plan and will continue to be made available at least at the primary business office of the MTW PHA.

<u>Vancouver Housing Authority</u>	<u>WA008</u>
<b>MTW PHA NAME</b>	<b>MTW PHA NUMBER/HA CODE</b>
<i>I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §3729, 3802).</i>	
<u>Joan Caley</u>	<u>Board Chair</u>
<b>NAME OF AUTHORIZED OFFICIAL</b>	<b>TITLE</b>
<u></u>	<u>January 25, 2024</u>
<b>SIGNATURE</b>	<b>DATE</b>
* <i>Must be signed by either the Chair 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 Chair or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.</i>	

## APPENDIX B: LOBBYING DISCLOSURES

DocuSign Envelope ID: 383A0FC4-802A-4605-9477-34969ED0CB6B

OMB Approval No. 2577-0157 (Exp. 11/30/2023)

### Certification of Payments to Influence Federal Transactions

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing

Public reporting burden for this information collection is estimated to average 30 minutes. This includes the time for collecting, reviewing, and reporting data. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number.

Applicant Name:

Vancouver Housing Authority WA008

Program/Activity Receiving Federal Grant Funding

Housing Choice Voucher and Public Housing Programs

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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)

Name of Authorized Official

Andy Silver

Title

Chief Executive Officer

Signature

DocuSigned by:

*Andy Silver*

Date (mm/dd/yyyy)

1/26/2024





## APPENDIX C: HARDSHIP POLICY

### FINANCIAL HARDSHIP EXEMPTION FROM MTW RENT REFORM POLICIES

For a PHA in the Moving to Work demonstration, HUD requires the agency to adopt a policy for addressing hardship cases caused by agency established rent reform initiatives. [MTW Amended and Restated Agreement]

#### MTW Rent Reform Policies

##### VHA Policy

VHA has implemented the following MTW rent reform initiatives:

1. Simplified Utility Allowance Schedule (Activity 2009-08)
2. Replacement of Medical Expense Deduction (Activity 2009-10)
3. Minimum Earned Income Rent Reform (Activity 2013-01)
4. Alternative TTP Calculation – 35% (Activity 2015-02)

#### Tenant Choice Exemptions – Minimum Earned Income

Families affected by the Minimum Income Rent Reform are eligible for a six-month exemption period that the family may choose to use at any time without prior VHA approval. To use this exemption the family must request it, using the VHA form for that purpose, at least two weeks prior to the first of the month they want to be exempt from the minimum income. The minimum length of time the family may request is two months and each family is only eligible for a total of six months of exemption that they may use without VHA approval. The Tenant Choice Exemption must be utilized before requesting a Financial Hardship Exemption.

#### VHA Defined Financial Hardships

For the purpose of an exemption from a MTW rent reform policy, VHA defines a financial hardship as one that is directly and primarily due to one or more MTW rent reform policies and is significant enough that the family is facing the loss of their housing through eviction or utility shutoff due to their inability to pay. VHA may consider exceptional circumstances other than those listed below. In all cases VHA will expect work-able family members will be working or actively seeking work and that families will be living in as economical a unit as practical to meet their needs when considering whether a Moving to Work policy is causing a hardship. VHA is only able to approve exemptions from MTW rent reform policies and is not able to waive policies based on program regulations.

#### Simplified Utility Allowance Hardship.

A hardship exemption to this policy will cause the family's rent to be determined using a calculated utility allowance instead of the Simplified Utility Allowance. To demonstrate a hardship:

1. The family cannot be living in a unit that is larger than their voucher size, unless the unit rent is less than the Payment Standard for their voucher size or a change in household composition has occurred within the last 90 days.
2. The family's share of rent plus actual monthly utility costs must exceed 50% of their income, including any Minimum Earned Income.
3. The family's non-essential expenses cannot be more than 20% of their income.
4. For consideration of a hardship exemption, expenses considered essential include rent, food, utilities, and medical or disability related expenses. Reasonable employment, education, or disability related transportation expenses, and employment or education related daycare expenses will also be considered essential when determining a hardship.

#### **Replacement of Medical Expense Deduction.**

A hardship exemption to this policy will cause the Voucher Program to consider actual out-of-pocket medical expenses when determining the family's share of rent. To demonstrate a hardship:

1. The family must have an elderly (62 or older) or disabled Head of Household, Spouse, or Co-head.
2. The family must have eligible, ongoing, out-of-pocket medical expenses.
3. The family's non-essential expenses cannot be more than 20% of their income.
4. For consideration of a hardship exemption, expenses considered essential include rent, food, utilities, and medical or disability related expenses. Reasonable employment, education, or disability related transportation expenses, and employment or education related daycare expenses will also be considered essential when determining a hardship.

A hardship exemption does not determine the amount of the medical deduction. A review of medical expenses will be completed by the Voucher Department if a hardship is granted.

#### **Minimum Earned Income.**

A hardship exemption to this policy will cause the Voucher Program to consider actual household income, without imputed income, when determining the family's share of rent. To demonstrate a hardship, the family must provide documentation that one of the following applies:

1. They are currently working with Bridgeview Resources, WorkSource, or other work opportunity programs to find employment, or
2. A qualified professional can confirm they are unable to work because of a short term physical or mental health condition.

The exemptions above are in addition to standard definitions of Workable. See MTW Annual Plan, activity 2013-01 for the definition of work-able.

#### **Alternative TTP Calculation.**

A hardship exemption to this policy will cause the Voucher Program to calculate 30% of household income when determining the family's Total Tenant Payment (TTP). To demonstrate a hardship, the following must apply:

1. The family must not have any Minimum Earned Income imputed to them.

2. The family cannot be living in a unit that is larger than their voucher size, unless the unit rent is less than the Payment Standard for their voucher size, or a change in household composition has occurred within the last 90 days.
3. The family's rent plus actual monthly utility costs must exceed 50% of their calculated income, including any Minimum Earned Income.
4. The family's combined non-essential expenses cannot be more than 20% of their calculated income. .
5. For consideration of a hardship exemption, expenses considered essential include rent, food, utilities, and medical or disability related expenses. Reasonable employment, education, or disability related transportation expenses, and employment or education related daycare expenses will also be considered when determining a hardship.

### **Hardship Exemption Requests**

#### VHA Policy

Families must utilize their 6 month Tenant Choice exemption to seek a Hardship Exemption to a MTW policy. A request for a hardship exemption must be made using the appropriate VHA form. The form contains questions about the family's finances, employment situation, and plans for resolving their financial hardship. If documentation is required, the family must submit it with their request. Incomplete requests will not be considered. Persons with disabilities, limited English proficiency, or who do not possess basic literacy skills may request assistance from VHA staff with preparing their request.

### **Determination of Hardship**

#### VHA Policy

All requests will be evaluated by a reviewer, designated by the VHA Executive Director. The family may request to speak with the reviewer by phone or virtual meeting when they submit their request.

Requests will initially be reviewed to see if the family is affected by a MTW rent reform policy and if required documentation has been provided. If not, the request will not be accepted. The family will be notified in writing within ten business days that their request cannot be accepted and why. The family may submit another request with additional information.

Accepted requests will be evaluated and a determination will be made within 30 days of receipt of the completed request. The reviewer may require the family to provide additional information or documentation of any factors used in making a determination, such as the family's loss of income, unpaid expenses, notices, etc.

The decision may set conditions the family must meet in order to have the hardship request approved. Conditions may include requiring the family to apply for benefits they may be eligible for, and/or participate in a self-sufficiency program or educational classes offered by the VHA or a partnering agency.

The decision will determine if a financial hardship exists, and the appropriate length of any approved hardship exemption.

## Implementation of Hardship Exemption Determinations

### VHA Policy

**No Financial Hardship** – If the reviewer determines that no VHA defined financial hardship exists the family will be notified of the decision and of their right to make another request if their situation changes and of their right to request an informal hearing.

**Temporary Hardship** – If the reviewer determines that a temporary hardship exists on an exemption request regarding a MTW initiative, the reviewer may determine that no exemption be granted or that a temporary exemption be granted depending on the severity of the hardship and the expected recovery from the hardship.

A temporary exemption may include a decision to reduce the family's rent by eliminating the effect of the rent reform policy or policies for a specific period of time, usually at least two months but not more than six months.

**Long-Term Hardship** – If the reviewer determines that the financial hardship is long-term, the reviewer may decide to exempt the family from the effect of the MTW rent reform policy or policies until their next regularly scheduled reexamination or on a permanent basis.