

Vancouver Housing Authority

MOVING TO WORK ANNUAL PLAN 2025

Submitted to HUD for Approval November 15, 2024

Moving to Work FY2025 Annual Plan

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, older adults, and people with disabilities. In the early 1990s, VHA began using its authority to issue tax-exempt bonds to acquire mixed-income properties. These properties help reduce VHA's dependence on federal funding while providing housing for people earning between 60% and 80% of the area median income. Today, VHA assists with the full range of housing needs including emergency shelters that are operated by partnering nonprofits, permanent supportive housing serving people exiting homelessness, subsidized housing, low-income housing tax credit properties, mixed-income properties, affordable homeownership and rental assistance vouchers. VHA administers about 3,200 vouchers (including ports) and owns and/or manages about 3,500 apartments.

HUD selected the VHA to participate in the Moving to Work (MTW) demonstration in 1999. The MTW program has provided 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 2025 Annual MTW Plan conforms to the latest requirements.

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

In 2024, the VHA Board of Commissioners updated our mission statement and adopted a new strategic plan centered around five strategic priorities.

VHA's mission is to provide opportunities to people experiencing housing barriers while honoring their personal dignity and maintaining public trust.

STRATEGIC PRIORITIES

1. **Equitable Impact:** Collaborate with those most impacted by our decision-making and program delivery to remove structural barriers and improve outcomes.
2. **Expand Affordable Housing:** Increase and improve the supply of quality, sustainable, affordable housing to meet the needs of the community.
3. **Financial Sustainability:** Develop flexible and stable revenue to create additional capacity to support VHA's mission.
4. **Increase Prosperity:** Provide services, policies and programs that empower residents to pursue their version of prosperity.
5. **Operational Excellence:** Create an environment that fosters commitment, passion and excitement for VHA's mission and vision and aligns with our core values.

i. Short-Term MTW Goals

VHA's MTW funding flexibility formula for our Housing Choice Voucher Program (HCVP) has not kept up with the large rent increases our community has experienced over the past five years. This has caused a structural deficit in our MTW program and prevented VHA from leasing due to program attrition for over three years. VHA has submitted a proposed amendment to our MTW Agreement to HUD to fix the structural funding deficit. VHA's MTW goals for 2025 are largely dependent upon the outcome of the proposed amendment.

If funding allows, VHA will undo various policies that were designed to shift costs from VHA to voucher participants. Instead, VHA will focus on programmatic partnerships that assist voucher recipients to identify and remove barriers to increasing their income. These partnerships include financial counseling, education, training, and employment assistance. VHA will prioritize partnerships that focus on demographic groups that face the greatest systemic barriers.

ii. Long-Term MTW Goals

Beyond the current plan year, VHA will continue to look for opportunities to simplify the administrative complexity of the voucher program. VHA will also examine potential rent reform policies that incentivize employment without adding to voucher participants' rent burden.

SECTION II: GENERAL OPERATING INFORMATION

A. 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										
TOTAL PUBLIC HOUSING UNITS TO BE ADDED IN THE PLAN YEAR:										N/A

* 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: N/A

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.

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
Englund Manor WA008000516	29	Streamlined voluntary conversion to PBV to close out Public Housing
TOTAL: PUBLIC HOUSING UNITS TO BE REMOVED IN THE PLAN YEAR	29	

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.

Englund Manor 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
Englund Manor	29 Maximum	No	Conversion of Public Housing
Lincoln Place II	40 Maximum	No	New construction Supportive Housing
Miles Terrace	69 Maximum	No	Ending LNT Rent Buy-Down and doing PBV
TOTAL: PLANNED NEW PROJECT BASED UNITS IN PLAN YEAR	138		

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 four, 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 2nd Step
Camas Ridge	8	Leased	No	A 51-unit market rate project
Caples Terrace	28	Leased	No	Previously public housing
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

Englund Manor	29	Committed	No	Previously public housing
The Elwood	46	Leased	No	Previously public housing
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 Court II	30	Leased	No	49-unit LIHTC, Reach CDC
Kauffman Townhomes	10	Leased	No	10-unit project owned by 2nd 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, 2nd Step Housing
The Meridian	46	Leased	No	Previously public housing
Meriwether Place	23	Leased	No	30-unit LIHTC, CNPH
Mill Creek	44	Leased	Yes (12)	32 senior and family units; 12 RAD transfer
Nám'u gas	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	138	Leased	Yes (48)	Previously public housing, RAD portion 48 units
Smith Tower	3	Leased	No	170 units, owned by Mid-Columbia
Tenny Creek	40	Leased	No	Previously public housing
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
TOTAL: PLANNED EXISTING PROJECT-BASED VOUCHERS	1,024			

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
<ul style="list-style-type: none"> • VHA will transfer the remaining 30 RAD units at VHA Apartment Homes to properties to be determined in 2025. • Local non-traditional units: <ul style="list-style-type: none"> ○ New construction at Laurel Manor (82 units)

- Rehabilitation across Cedar Portfolio (166 units)

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"> • \$50,000 for new construction at Laurel Manor. • \$50,000 for rehabilitation across Cedar Portfolio (Forest Ridge, Highland Park, Walnut Grove). • VHA will continue to look for opportunities to use MTW funds to help VHA acquire or develop affordable housing. • VHA also has several potential acquisitions currently under negotiation, which if successful will require the use of Dispo funds.

B. 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 HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	0	0
MTW Housing Choice Vouchers (HCV) Utilized	23817	1985
Local, Non-Traditional: Tenant-Based^	308	26
Local, Non-Traditional: Property-Based^	4659	388
Local, Non-Traditional: Homeownership^	0	0
PLANNED TOTAL HOUSEHOLDS SERVED:	28784	2399

* "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.

^ 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	1505	125

Property-Based	LIHTC Rent Buy Down/ 2021-02	1047	87
Property-Based	Market Unit Rent Buy Down/2015-01	403	34
Property-Based	MTW-Funded Developments /2023-01	1704	142
Tenant Based	Transitional Housing Programs/ 2014-04	308	26
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	N/A
MTW Housing Choice Voucher	Leasing and utilization rates are an ongoing challenge as VHA's MTW funding flexibility formula for our Housing Choice Voucher Program has not kept up with the large rent increases our community has experienced over the past five years, thus payment standards and tenant costs do not permit for leasing at market rates as in the past.
Local, Non-Traditional	Figures are projections based on MOUs currently in place and figures reported in FY2024.

C. 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	3845	Closed	NA
Allegro Pointe	PBV Site	1252	Closed	Yes
Aurora Place	PBV Site	5030	Closed	No
Camas Ridge	PBV Site	9693	Closed	No
Caples Terrace	PBV Site	47	Closed	No
Columbia Heights	PBV Site	1481	Closed	No

The Elwood	PBV Site	1	Partially Open	No
Englund Manor	Public Housing Site	964	Closed	No
Fort Vancouver Terrace	PBV Site	6575	Closed	NA
Fruit Valley	PBV Site	5200	Closed	No
Isabella Court	PBV Site	5430	Closed	No
Kauffman Townhomes	PBV Site	2817	Closed	No
Lainie's Crossing	PBV Site	581	Closed	No
Lincoln Place	PBV Site	0	Partially Open	NA
Lincoln Place II	PBV Site	0	Partially Open	NA
The Meadows	PBV Site	11325	Closed	No
The Meridian	PBV Site	3	Partially Open	NA
Meriwether Place	PBV Site	3	Partially Open	NA
Mill Creek	PBV Site	10139	Closed	No
Nám'u gas	PBV Site	1	Partially Open	NA
Neals Lane	PBV Site	1979	Closed	No
The Pacific	PBV Site	1	Partially Open	NA
Rhododendron Place	PBV Site	59	Partially Open	NA
Skyline Crest	PBV Site	10321	Closed	No
VHA Apartment Homes	PBV Site	9650	Closed	No
Vista Court	PBV Site	3272	Closed	NA

Please describe any duplication of applicants across waiting lists:

Applicants can apply to multiple waiting lists. 68% 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
All HCV waiting lists	VHA plans to begin incrementally converting lottery-based HCV waiting lists to waiting lists ordered by date and time of submission, as each falls to zero.
Lincoln Place II	Waiting list to partially open during the Plan Year.
Fort Vancouver Terrace	Waiting list to close during the Plan Year.
Vista Court	Waiting list to close during the Plan Year.
Fruit Valley	Waiting list to be removed during the Plan Year.
Miles Terrace	Waiting list to partially open during the Plan Year.

SECTION III: PROPOSED MTW ACTIVITIES

ACTIVITY 2015-02: ALTERNATIVE TTP CALCULATION - AMENDED

i. **ACTIVITY DESCRIPTION**

This activity was originally approved in the FY2015 MTW Annual Plan, implemented in FY2015, and later changed in an amendment to the FY2017 Annual Plan.

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 program. PHAs normally determine TTP by taking the highest of:

- 1) 30% of the household's monthly adjusted income; or
- 2) 10% of the household's monthly income

When this activity was first implemented, VHA used it to set TTP at 33% of adjusted income rather than 30%. Effective January 1, 2018, that percentage was raised to 35%.

This amendment provides VHA with the flexibility to set the HCV program TTP between 30% and 35% of household monthly adjusted income. Ultimately, VHA's goal is to end this MTW activity and revert to 30% TTP. However, due to current funding constraints, VHA seeks the flexibility to modify the TTP incrementally over time as funding allows. Once the TTP drops to 30%, VHA will close out the MTW activity.

Some properties 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.

Impact on Statutory Objectives

This activity will reduce costs and achieve greater cost effectiveness and will also increase housing choice.

Implementation

VHA aims to implement this activity in FY2025, assuming HUD approval as well as financial viability.

Upon activity approval, VHA will engage in a process with its staff, Resident Advisory Board, Board of Commissioners and other community stakeholders to determine how to prioritize lowering the TTP percentage compared to other MTW activities and new leasing. When consensus is reached on the amount the TTP percentage will be lowered, a corresponding Administrative Plan update will be brought to VHA's Board of Commissioners for approval prior to implementation.

The TTP percentage will be updated a maximum of once per calendar year.

ii. **ACTIVITY METRICS INFORMATION**

The baselines and benchmarks are not changing as part of this amendment.

CE #1: AGENCY COST SAVINGS				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Total cost of task in dollars (decrease).	\$18,944,340	\$18,094,340		

CE #5: INCREASE IN AGENCY RENTAL REVENUE				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Total Household contributions towards housing assistance.	\$0	\$0		

HC #1: ADDITIONAL UNITS OF HOUSING MADE AVAILABLE				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Number of new housing units made available (increase).	0	120		

HC #3: DECREASE IN WAIT LIST TIME				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Average applicant time on wait list in months (decrease)	102	102		

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

This activity is authorized under Section D.2.a. of Attachment C of the Amended and Restated Agreement, which authorizes the Agency to determine family payment toward rent and establish subsidy levels that differ from currently mandated program requirements.

iv. **IMPACT ANALYSIS**

Each percentage point reduction in TTP from 35% would increase VHA’s annual HAP costs by an estimated \$376,000. However, VHA would not plan to make any changes to the 35% TTP unless there was sufficient MTW budget authority to do so.

If implemented, this activity would reduce an estimated 2,128 households’ rents by up to \$74 per month / \$883 per year on average. Each percentage point reduction in TTP will amount to \$15 per month saved per household.

	Total	Average by HH
Difference monthly (35>30% TTP)	\$ 156,619	\$ 74

Difference annually (35>30% TTP)	\$ 1,879,427	\$ 883
	Total	Average by HH
Difference monthly (1% TTP decrease)	\$ 31,324	\$ 15
Difference annually (1% TTP decrease)	\$ 375,885	\$ 177

v. **HARDSHIP POLICY**

The existing hardship policy will continue to be in place while TTP calculation remains above HUD’s standard 30% of household monthly adjusted income. Households experiencing a hardship that puts them at risk of eviction or utility shutoff due to this activity will be able to request a short- or long-term exemption from the policy. See Appendix D for full Hardship Policy.

vi. **DESCRIPTION OF ANNUAL REEVALUATION**

Once implemented, this activity will directly benefit all households subject to it. VHA will review the outcomes of families whose rent was changed and the overall cost to the agency. If there is a negative impact to the household or the cost to the agency proves to be too burdensome, an analysis will be completed to determine if a change in the activity should be implemented, and under what circumstances.

vii. **TRANSITION PERIOD**

VHA will plan to adjust the percentage of adjusted income (TTP) at the first annual reexamination that a household has after this activity is implemented (January 1, 2025, assuming HUD approval and budget viability). Households on the three-year annual reexamination schedule for fixed-income will have their TTP adjusted at their anniversary date in 2025 regardless of whether they are scheduled for a full reexamination or just an annual adjustment to reflect any COLA and Payment Standard/Utility Allowance schedule changes.

Households will be notified of the reason for the change and reminded of their right to an informal hearing and to request an exemption under the hardship policy.

ACTIVITY 2014-06 ALTERNATIVE PROJECT-BASED VOUCHER PROGRAM - AMENDED

i. **ACTIVITY DESCRIPTION**

This activity was approved in amendment to the FY2014 MTW Annual Plan and was implemented in FY2014. It was resubmitted 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. This amendment aims to eliminate the cap on project-based voucher allocations in order to reduce administrative costs.

- ii. 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.
 - Project cap: 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/NSPIRE 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.
 - Program cap: VHA will not have a cap on the amount of its HCV program it can project-base.

Impact on Statutory Objectives

This activity will result in increased housing choice, as these flexibilities with PBV will result in new housing opportunities for very low-income families. It will also help streamline processes, allowing VHA to achieve greater administrative efficiency.

Implementation

VHA anticipates implementing this activity upon approval of this Plan.

iii. **ACTIVITY METRICS INFORMATION**

CE #1: AGENCY COST SAVINGS				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Total cost of task in dollars (decrease).	\$3,119	\$0		

CE #2: STAFF TIME SAVINGS				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?

Total time to complete the task in staff hours.	103	0		
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HC #3: DECREASE IN WAIT LIST TIME				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Average applicant time on wait list in months (decrease).*	46	46		

*In recent years, this metric has not been applicable as VHA's project-based waiting lists have been selected by lottery, making the amount of time spent on waiting lists completely random. However, VHA intends to begin shifting back to date-and-time based waiting lists in FY2025, thus will maintain this metric for future reporting.

iv. **COST IMPLICATIONS**

Minor cost savings anticipated as a result of administrative efficiencies resulting in staff time savings.

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

This activity is authorized under Attachment C, Sections D.1.b, D.1.e, D.2.d., D.4., and D.7.a. of the Amended and Restated Agreement. The tenet being updated is authorized under Section D.1.e., which authorizes VHA to determine the percentage of housing voucher assistance that it may project-base.

ACTIVITY 2014-04: LOCAL NON-TRADITIONAL: TRANSITIONAL HOUSING - AMENDED

i. **ACTIVITY DESCRIPTION**

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 to account for a change in transitional housing partners. With this amendment, VHA proposes expanding the activity to include families below 50% AMI rather than 30% AMI in order to broaden who might qualify for transitional housing assistance.

The Transitional Housing Program supports transitional housing for homeless individuals and families with income below 50% 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 unit 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.

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.

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.

Impact on Statutory Objectives

This activity will result in increased housing choice, as it will allow low-income families to receive temporary housing services and later transition to permanent housing.

Implementation

VHA anticipates implementing this activity upon approval of this Plan.

ii. **ACTIVITY METRICS INFORMATION**

The metrics are being modified as part of this amendment. Metrics SS #1 (increase in household income) and SS #3 (increase in positive outcomes in employment status) do not apply to this activity under our current partnership, as the partnering agency’s primary role is transitional housing for those temporarily unable to work – thus all are unemployed while living there. Further, while self-sufficiency remains a central focus, Metric SS #4 (households removed from TANF) is not a tracked goal of our current transitional housing partner. As such, SS #1, SS#3, and SS #4 metrics have been removed. Data will be provided by transitional housing partner(s).

CE #4: INCREASE IN RESOURCES LEVERAGED				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Amount of funds leveraged in dollars (increase).	\$0	\$90,000		

SS #6: REDUCING PER UNIT SUBSIDY COSTS FOR PARTICIPATING HOUSEHOLDS				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Average amount of local subsidy (decrease).	\$183	\$183		

SS #8: HOUSEHOLDS TRANSITIONED TO SELF-SUFFICIENCY				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Number of households transitioned to self-sufficiency (increase).	0	10		

HC #3: DECREASE IN WAIT LIST TIME				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?

Average applicant time on wait list in months (decrease).	102	0		
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HC #4: DISPLACEMENT PREVENTION				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Number of households that would lose assistance or need to move (decrease).	35	0		

HC #5: INCREASE IN RESIDENT MOBILITY				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Number of households able to move (increase).	0	5		

iii. **COST IMPLICATIONS**

VHA anticipates a positive cost implication with this activity by keeping the contribution per bed/room far 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 Attachment C, Section B.1., and the Use of MTW Funds in Attachment D of the Amended and Restated Agreement. VHA will also comply with the terms of PIH Notice 2011-45 Parameters for Local, Non-Traditional Activities under the Moving to Work Demonstration Program.

ACTIVITY 2009-10: REPLACEMENT OF MEDICAL EXPENSE DEDUCTION - AMENDED

i. **ACTIVITY DESCRIPTION**

This activity was originally approved in an amendment to the FY2009 MTW Annual Plan and implemented in FY2009. It was designed to eliminate the individual calculation and verification of medical expenses, alongside increasing the standard Elderly / Disabled family deduction from \$400 to \$700.

To keep up with rising medical costs faced by Elderly and Disabled families, and mirroring HUD’s increase to the mandatory elderly and disabled deduction from \$400 to \$525 via HOTMA section 102, this amendment would allow VHA to increase the deduction amount to between \$700 and \$1,000 per year.

This activity is expected to continue greatly reducing the number of verifications required for recertifications, simplifying the process, and allowing for the three-year recertification schedule detailed in Activity 2007-02.

Families who face a significant rent increase due to this policy will continue to have access to the hardship policy, which allows for a phased-in rent increase or a rent cap for those facing hardships.

Impact on Statutory Objectives

This activity will achieve administrative efficiencies and reduce costs by simplifying the medical expense verification process. Significant reductions in staff time and error rates are expected to continue due to reductions in required verifications and calculations.

Implementation

VHA aims to implement this activity in FY2025, assuming HUD approval as well as financial viability.

Upon activity approval, VHA will engage in a process with its staff, Resident Advisory Board, Board of Commissioners and other community stakeholders to determine how to prioritize increasing the deduction compared to other MTW activities and new leasing. When consensus is reached on the amount VHA will increase the deduction, a corresponding Administrative Plan update will be brought to VHA’s Board of Commissioners for approval prior to implementation.

The deduction will be increased a maximum of once per calendar year.

ii. **ACTIVITY METRICS INFORMATION**

The baselines and benchmarks are not changing as part of this amendment.

CE #1: AGENCY COST SAVINGS				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Total cost of task in dollars (decrease).	\$5,974	\$600		

CE #2: STAFF TIME SAVINGS				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Total time to complete the task in staff hours (decrease).	217	22		

CE #3: DECREASE IN ERROR RATE OF TASK EXECUTION				
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UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Average error rate in completing a task as a percentage.	10.31%	0%		

iii. NEED/JUSTIFICATION FOR MTW FLEXIBILITY

Attachment C, Sections C.11. and D.2. authorize the Agency to determine family payment toward rent and establish subsidy levels that differ from currently mandated program requirements.

iv. IMPACT ANALYSIS

If VHA raised the deduction to \$1,000, it would increase annual HAP costs by an estimated \$618,300. However, VHA would not plan to make any changes to the \$700 standard deduction unless there was sufficient MTW revenue to do so.

If implemented, this activity would increase an estimated 2,061 households' standard Elderly / Disabled deduction by up to \$300 per year per household. Each \$50 increase in annual deduction amount would equate to an estimated \$103,050 in costs to VHA.

	Estimated cost to VHA	Additional annual deduction per family
Raise deduction from \$700 to \$1,000	\$ 618,300	\$ 300
Raise deduction from \$700 to \$950	\$ 515,250	\$ 250
Raise deduction from \$700 to \$900	\$ 412,200	\$ 200
Raise deduction from \$700 to \$850	\$ 309,150	\$ 150
Raise deduction from \$700 to \$800	\$ 206,100	\$ 100
Raise deduction from \$700 to \$750	\$ 103,050	\$ 50

v. HARDSHIP POLICY

The existing hardship policy, which requires the Agency review actual out-of-pocket medical expenses to determine family's share of rent for families who report facing significant rent burdens, will continue to be available while this Activity is in place. See Appendix D for full Hardship Policy.

vi. DESCRIPTION OF ANNUAL REEVALUATION

Once implemented, this activity will directly benefit all households subject to it. VHA will review the outcomes of families whose deduction was changed and the overall cost to the agency. If there is a negative impact to the household or the cost to the agency proves to be too burdensome, an analysis will be completed to determine if a change in the activity should be implemented, and under what circumstances.

vii. TRANSITION PERIOD

VHA will plan to adjust the Elderly and Disabled family deduction at the first annual reexamination that a household has after this activity is implemented (January 1, 2025, assuming HUD approval and budget viability). Households on the three-year annual

reexamination schedule for fixed-income will have their deduction adjusted at their anniversary date in 2025 regardless of whether they are scheduled for a full reexamination or just an annual adjustment to reflect any COLA and Payment Standard/Utility Allowance schedule changes.

Households will be notified of the reason for the adjustment and reminded of their right to an informal hearing and to request an exemption under the hardship policy.

ACTIVITY 2025-01: UTILIZATION OF LIHTC TENANT INCOME CERTIFICATION (TIC) FOR INCOME AND ASSET VERIFICATION

i. ACTIVITY DESCRIPTION

For project-based units that are also part of the LIHTC program, VHA proposes to utilize the Tenant Income Certification (TIC) form required under the LIHTC Program as verification of income and assets. Owners of project-based units that utilize tax credits must comply with federal LIHTC regulations which are nearly identical to HCV regulations with regard to verification of income and assets when determining and recertifying income eligibility of residents.

Therefore, at initial eligibility and recertification for each tenant residing in project-based units that also utilize LIHTC, the owner and VHA are duplicating efforts in the verification process. This causes unnecessary delays in processing new tenants and creates redundant demands on the clients every year for the same documentation. The TIC form used by the LIHTC program requires the client's statement of income and assets, the client's signature, and the property owner's certification that they verified the data provided by the client and is therefore reliable documentation of the client's income/asset profile.

Impact on Statutory Objectives

The proposed activity reduces costs and achieves greater cost effectiveness by eliminating redundant efforts and increasing administrative efficiency in processing applicants' and tenants' income and asset verification, while still conforming to established, federal LIHTC guidelines. By streamlining this process, VHA will increase staff productivity and reduce total administrative costs of the eligibility and recertification processes.

Implementation

VHA anticipates implementing this activity upon approval of this Plan.

ii. ACTIVITY METRICS INFORMATION

CE #1: AGENCY COST SAVINGS				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?

Total cost of task in dollars (decrease).	Total cost prior to implementation: \$19,192	Total cost after implementation: \$12,795		
	Average hourly wage: \$23.52	Average hourly wage: \$23.52		
	Total staff time required prior to implementation: 816 hours	Total staff time required after implementation: 544 hours		
	Income and asset verifications executed in FY 2023: 272	Expected income and asset verifications executed in FY 2024: 272		
	Time to complete certifications prior to implementation: 3 hours*	Time to complete certifications after implementation: 2 hours*		

CE #2: STAFF TIME SAVINGS				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Total time to complete the task in staff hours (decrease).	Total staff time required prior to implementation: 816 hours	Total staff time required after implementation: 544 hours		
	Income and asset verifications executed in FY 2023: 272	Expected income and asset verifications executed in FY 2024: 272		
	Time to complete certifications prior to implementation: 3 hours*	Time to complete certifications after implementation: 2 hours*		

*VHA estimates average time savings per verification of income / assets using TIC to be one hour.

iii. **COST IMPLICATIONS**

VHA anticipates positive cost implications with this activity as it will simplify processes, resulting in staff time savings of approximately \$6,400 per year. Cost savings will depend on the volume of certifications needed.

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

Attachment C, Statement of Authorizations, Section D.3.b., authorizes the Agency to adopt and implement any reasonable policy for verifying family income and composition that differs from the currently mandated requirements, in this case streamlining the verification process in order to create administrative efficiencies.

ACTIVITY 2025-02: INCOME CALCULATION FOR YOUNG ADULTS

i. ACTIVITY DESCRIPTION

Current HUD regulations require that all earned income of young adults between the ages of 18 and 21 be factored into the household’s rent. In many cases where a young adult works, the head of household has no control over the young adult’s willingness to contribute income toward the rent. In some cases, this increased rent burden may place the family at risk for being terminated from the program if the head of household is unable to pay the young adult’s portion of the increased rent.

VHA proposes to provide these young adults, ages 18-21, who are not the head of household or co-head, an incentive to pursue employment and become economically self-sufficient – while avoiding increasing family rent burdens – by revising the definition of countable income. This revision will exclude all earned income for these young adults when determining rent for the entire household.

Beyond having their earned income exempted, young adults may need additional support in finding and sustaining gainful employment and moving toward self-sufficiency and independence. VHA will work to develop and/or expand partnerships with local organizations to support young adults with self-sufficiency in parallel with this activity.

Relation to Statutory Objectives

This activity supports the MTW statutory objective of incentivizing self-sufficiency by encouraging young adults to seek and obtain employment and work toward economic independence without the deterrent and burden of having their income increase the rent paid by the family.

Implementation

VHA aims to implement this activity in FY2025, assuming HUD approval as well as financial viability.

ii. ACTIVITY METRICS INFORMATION

SS #1: INCREASE IN HOUSEHOLD INCOME				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Average earned income of young adults, ages 18-21, affected by this policy in dollars (increase).	As of FY2023, there were 280 young adults between the ages of 18-21. 105 were employed (34 with EID).	VHA anticipates an increase in their average earned income by 10% or \$16,679.		

	On average they earned \$15,163.			
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iii. **NEED/JUSTIFICATION FOR MTW FLEXIBILITY**

Attachment C, Section D.2.a., authorizes VHA to adopt and implement a reasonable rent policy for its HCV program: to disregard the earned income for rent purposes of young adult household members aged 18-21 who are not the head of household or co-head, in order to promote young adults' self-sufficiency.

iv. **IMPACT ANALYSIS**

There are currently 234 households in VHA's HCV Program that would be affected by this policy. Of the 280 young adults (ages 18-21) across these households, 105 are currently employed, 34 of whom have Earned Income Disallowances (EID) in place. On average, they earn over \$15,000 per year, totaling nearly \$1.6 million.

Earned income of young adults (ages 18-21) who are not head or co-head	
Maximum Amount Earned	\$ 48,027
Minimum Amount Earned	\$ 874
Average Amount Earned	\$ 15,163
Total Amount Earned	\$ 1,592,095

Currently \$553,743 of the \$1,592,095 total earned income is being excluded through participation in EID.

If VHA were to exclude the income earned by young adults ages 18-21 who are not the head or co-head, households with employed, young adults would be expected to save an average of \$288 per month from their current portion of rent, at an estimated cost of \$30,285 per month to VHA.

Additional income to be excluded per year	\$ 1,038,352
Additional income to be excluded per month	\$ 86,529
35% TTP per month: Monthly total cost to VHA	\$ 30,285
35% TTP per month: Savings per family	\$ 288

v. **HARDSHIP POLICY**

N/A

vi. **DESCRIPTION OF ANNUAL REEVALUATION**

Once implemented, this activity will directly benefit the households impacted. VHA will review the outcomes of families whose rent was changed and the overall cost to the agency. If there is a negative impact on the household or the cost to the agency proves to be too

burdensome, an analysis will be completed to determine if a change in the activity should be implemented, and under what circumstances.

vii. **TRANSITION PERIOD**

VHA will plan to begin excluding young adults’ earned income at the first annual reexamination that a household has after this activity is implemented (January 1, 2025, assuming HUD approval and budget viability). Households on the three-year annual reexamination schedule for fixed-income will have their household income adjusted, as applicable, at their anniversary date in 2025 regardless of whether they are scheduled for a full reexamination or just an annual adjustment to reflect any COLA and Payment Standard/Utility Allowance schedule changes.

Those young adults, ages 18-21, who are currently participating in EID will be required to forfeit their participation in EID prior to utilizing this new exemption.

ACTIVITY 2025-03: USING VOUCHER SIZE TO DETERMINE PAYMENT STANDARD

i. **ACTIVITY DESCRIPTION**

VHA is proposing an activity that determines payment standard by voucher size irrespective of the size of the unit families select. For example, a one-bedroom voucher holder who moves into a studio would receive a one-bedroom payment standard as opposed to a studio payment standard. This policy would benefit families who move into units smaller than their voucher size, also known as “shopping down.” Existing policy penalizes voucher holders who decide to move into units smaller than those designated on their vouchers, resulting in additional rent burden for families. This policy mitigates the increased costs for these families and provides them with a subsidy based solely on their family composition.

Relation to Statutory Objectives

This activity will result in increased housing choice for low-income families.

Implementation

VHA aims to implement this activity in FY2025, assuming HUD approval as well as financial viability.

ii. **ACTIVITY METRICS INFORMATION**

SS #2: INCREASE IN HOUSEHOLD SAVINGS				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?
Average amount of savings of households affected by this policy in dollars (increase).	In FY2024, 0 participants received an increase in payment standard	In FY2025, 7 residents are expected to receive an increase in payment standard that results in a		

	that lowered their rent portion.	lower tenant rent portion. Average monthly savings: \$143. Total annual savings per household: \$1,720		
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iii. **NEED/JUSTIFICATION FOR MTW FLEXIBILITY**

Attachment C, Section D.2.a., which authorizes VHA to adopt and implement a reasonable payment standard policy for its HCV program: to encourage voucher holders to live in units corresponding with their family sizes.

iv. **IMPACT ANALYSIS**

Although only seven families have a gross rent that exceeds the payment standard and would benefit from this policy *immediately*, there are an estimated total of 163 families who reside in units smaller than their voucher assignment and who represent the potential longer-term cost implications of this activity should current voucher holders move into more expensive units, and as new families join the program over time.

Upon implementation, the seven families with gross rents exceeding payment standards based on their voucher sizes would see an increase of an average \$103 per month in what they receive for housing assistance payments (HAP), leading to a total annual cost increase to VHA of approximately \$8,600.

Looking toward the future, based on current discrepancies between family sizes and corresponding voucher allowances overall, over time this activity is expected to cost less than \$300,000 annually to implement and provide more than 160 families an average of \$143 per month in additional HAP.

Bedrooms corresponding to family size	Corresponding Payment Standard	Bedrooms assigned by voucher	Corresponding Payment Standard	Families affected	Additional monthly HAP for families	Annual cost to VHA
1	\$1,610	0	\$1,500	152	\$110	\$200,640
2	\$2,574	1	\$1,610	1	\$964	\$11,568
3	\$2,574	2	\$1,839	3	\$735	\$26,460
4	\$2,995	3	\$2,574	4	\$421	\$20,208
5	\$3,444	4	\$2,995	2	\$449	\$10,776
6	\$3,893	4	\$2,995	1	\$898	\$10,776
Total:						\$280,428

v. **HARDSHIP POLICY**

N/A

vi. **DESCRIPTION OF ANNUAL REEVALUATION**

Once implemented, this activity will assist voucher holders who are prevented from moving into their preferred units due to affordability and alleviate the rent burdens of those

“shopping down”. VHA will review the outcomes of families whose rent was changed and the overall cost to the agency. If there is a negative impact to the household or the cost to the agency proves to be too burdensome, an analysis will be completed to determine if a change in the activity should be implemented, and under what circumstances.

vii. **TRANSITION PERIOD**

VHA will plan to adjust payment standard determination at the first annual reexamination that a household has after this activity is implemented (January 1, 2025, assuming HUD approval and budget viability). Households on the three-year annual reexamination schedule for fixed-income will have their payment standard adjusted, as applicable, at their anniversary date in 2025 regardless of whether they are scheduled for a full reexamination or just an annual adjustment to reflect any COLA and Payment Standard/Utility Allowance schedule changes.

ACTIVITY 2025-04: INCOME CALCULATION DEDUCTING CHILD SUPPORT

i. **ACTIVITY DESCRIPTION**

VHA proposes to implement an income deduction for working adults in the household who are making required child support payments that hinder their ability to pay their monthly rent portion. Currently, child support payments are not deducted from income calculations that determine the portion of rent paid by the participant, which can put participants at risk of falling behind on their rent and eventually being evicted. This activity allows working adults who furnish documentation of these payments to receive up to a 100% deduction of their total child support payments. Participants will be informed of this income deduction opportunity via language on the application completed at intake, and during reexaminations.

The amount deducted will be the lower of court-ordered payments or documented amount resident has paid over the past three months, not to exceed total of resident’s income.

Relation to Statutory Objectives

This activity will result in increased housing choice for low-income families in that those granted this hardship exemption would be better protected from the risk of losing assistance or needing to move, preventing displacement.

Implementation

VHA aims to implement this activity in FY2025, assuming HUD approval as well as financial viability.

ii. **ACTIVITY METRICS INFORMATION**

HC #4: DISPLACEMENT PREVENTION				
UNIT OF MEASUREMENT	BASELINE	BENCHMARK	OUTCOME	BENCHMARK ACHIEVED?

<p>Number of households at or below 80% AMI that would lose assistance or need to move (decrease).</p>	<p>In FY2024, 0 participants received this income deduction.</p>	<p>Once this policy is implemented in FY2025, VHA will track the number of participants who receive this income deduction.</p>		
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iii. **NEED/JUSTIFICATION FOR MTW FLEXIBILITY**

Attachment C, Section D.2.a. authorizes VHA to adopt and implement any reasonable policy to calculate the tenant portion of the rent that differs from the currently mandated program requirements, in this case exempting child support payments from income used to calculate rent in order to prevent displacement.

iv. **IMPACT ANALYSIS**

Although, historically, VHA has not tracked child support payments paid, had this activity been in place prior, it is suspected that participants who had required child support payments would have been much more likely to make their rent payments on time and avoid eviction. Further, child support *recipients* – many also low-income families in the community – would have received more consistent payments and witnessed more stability themselves.

Using child support payment recipients as a proxy, this activity is expected to support nearly 300 families with monthly total tenant payments (TTP) toward rent reduced by \$102 per family on average, at an estimated cost to the Agency of \$345,000 annually.

v. **HARDSHIP POLICY**

N/A

vi. **DESCRIPTION OF ANNUAL REEVALUATION**

Once implemented, VHA will review the outcomes of participants whose rent was changed and the overall cost to the agency. If there is a negative impact to the household or the cost to the agency proves to be too burdensome, an analysis will be completed to determine if a change in the activity should be implemented, and under what circumstances.

In addition, for the first year of implementation, VHA will cap the amount of child support payments that can be deducted from income at \$3,500 annually per household – in line with that being received by voucher program participants, on average – in order to ensure activity is accessible across families within budget while VHA works to better understand and track total cost implications.

vii. **TRANSITION PERIOD**

VHA will plan to implement child support payment deduction at the first annual reexamination that a household has after this activity is implemented (January 1, 2025, assuming HUD approval and budget viability). Households on the three-year annual reexamination schedule for fixed-income will have their child support payments deducted at

their anniversary date in 2025 regardless of whether they are scheduled for a full reexamination or just an annual adjustment to reflect any COLA and Payment Standard/Utility Allowance schedule changes.

SECTION IV: APPROVED MTW ACTIVITIES

A. 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 and was implemented in 2024.
- ii. Through this activity, VHA commits 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.

This activity follows the general parameters of PIH Notice 2011-45, as well as those specific to Housing Development Programs. Funds are 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.

In 2025, VHA plans to commit MTW LNT funds to developing Laurel Manor, a project consisting of 82 one-bedroom units designed to allow seniors to age in place. In addition, VHA plans to commit LNT development funds to rehabilitate the Cedar Portfolio, consisting of three senior housing properties totaling 164 one-bedroom and three two-bedroom units.

- iii. There are no non-significant changes planned for 2025.
- iv. There are no planned significant changes in 2025.

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

- i. This activity was approved in an amendment to the 2021 MTW Annual Plan and was implemented in 2021. It was amended in 2024 to adjust the target population to include households with income below 60% AMI.
- ii. 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 is 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.*

- iii. There are no non-significant changes planned for 2025.
- iv. There are no planned significant changes in 2025.

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 2025.
- iv. There are no planned significant changes in 2025.

ACTIVITY 2020-01 EXCLUSION OF CHILDCARE WAGES

- i. This activity was approved in an amendment to the 2020 MTW Annual Plan and 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 period of exclusion will be 24 months. Breaks in employment will not extend the length of the exclusion.

- iii. There is one non-significant change to this activity in 2025: As Activity 2013-01 (Minimum Earned Income Rent Reform) is no longer in place, it will not figure into earned income calculations.
- iv. There are no planned significant changes in 2025.

ACTIVITY 2018-02: LOCAL PAYMENT STANDARDS

- i. This activity was approved in an amendment to the FY2018 MTW Annual Plan and was implemented in 2018.
- 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 2025.
- iv. There are no planned significant changes in 2025.

ACTIVITY 2016-02: LOCAL BLENDED SUBSIDY

- i. This activity was approved in the FY2016 MTW Annual Plan and was implemented in 2020. It was 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 2025.
- iv. This activity will be closed in 2025 with the closure of VHA's public housing.

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

- i. This activity was 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. It was amended in 2024 to allow VHA to negotiate the buy-down amount with property owners and allow for buy-downs in properties already affordable to people at 50% AMI but not affordable to the property's residents.
- ii. 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 is 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-downs is 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.*

- iii. There are no non-significant changes planned for 2025.
- iv. There are no planned significant changes in 2025.

ACTIVITY 2014-05: INTERIM VERIFICATION POLICY

- i. This activity was approved under an amendment to the FY2014 MTW Annual Plan and was implemented in 2014.
- 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 shifted 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 are received before the 15th of the month, any resulting change in tenant rent will be effective the first of the following month. The VHA continues to obtain verification for initial eligibility reexaminations and for regular/annual reexaminations.
- iii. There are no non-significant changes planned for 2025.
- iv. There are no planned significant changes in 2025.

ACTIVITY 2014-01: MODIFIED FSS ESCROW CALCULATION

- i. This activity was approved in the FY2014 MTW Annual Plan and was implemented in 2014.
- 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 savings 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. 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.

- iii. There are no non-significant changes planned for 2025.
- iv. There are no planned significant changes in 2025.

ACTIVITY 2011-05: VHA STAFF TO PERFORM HQS/NSPIRE AND RENT REASONABLENESS ON VHA-OWNED PROPERTIES

- i. This activity was approved in the FY2011 MTW Annual Plan and was implemented in 2011. 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/NSPIRE 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 is one non-significant change to this activity in 2025 that updates inspection standards in order to adhere to NSPIRE standards once implemented.
- iv. There are no planned significant changes in 2025.

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 in 2009.
- 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 2025.
- iv. There are no planned significant changes in 2025.

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 in 2009.
- 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 2025.
- iv. There are no planned significant changes in 2025.

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 in 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 2025.
- iv. There are no planned significant changes in 2025.

ACTIVITY 2007-02: ALTERNATE REQUIRED REEXAMINATION SCHEDULE

- i. This activity was approved in the FY2007 MTW Annual Plan and was implemented in 2008. In an amendment to the FY2009 Plan, 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 2025.
- iv. There are no planned significant changes in 2025.

B. Not Yet Implemented Activities

VHA has no activities not yet implemented at this time.

C. Activities on Hold

VHA has no activities on hold at this time.

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
Minimum Earned Income Rent Reform/2013-01	FY2013	FY2013	FY2024	Not Successful
Reset of Required Re-exam Date after Interim/2009-13	FY2009	FY2009	FY2023	Concluded
Simplified Utility Allowance Schedule/2009-08	FY2009	FY2009	FY2023	Concluded
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 2025 numbers. Budget has not been finalized.

A. 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	28,270,804
70610	Capital Grants	-
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	1,863,003
71100+72000	Interest Income	-
71600	Gain or Loss on Sale of Capital Assets	-
71200+71300+71310+71400+71500	Other Income	7,221,368
70000	TOTAL REVENUE	\$37,355,175

ii. Estimated Application of MTW Funds

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	2,831,560
91300+91310+92000	Management Fee Expense	166,410
91810	Allocated Overhead	-
92500 (92100+92200+92300+92400)	Total Tenant Services	26,500
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	5,409
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	34,322,296
97400	Depreciation Expense	-
97500+97600+97700+97800+94300	All Other Expenses	3,000
90000	TOTAL EXPENSES	\$37,355,175

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 and Disposition proceeds) for activities authorized in the MTW Agreement. Uses may include capital needs rehabilitation, operating expenses, construction, redevelopment costs at properties where VHA has an ownership interest, development costs including acquisition or construction of affordable housing, as well as rental subsidies in Section 8 Voucher and Local Non-Traditional programs.</p> <p>VHA may use the funding flexibility allowed under MTW to provide additional services for the people we house. In addition to the grant-funded services of Family Self Sufficiency (FSS), MTW funds support navigation and care coordination services. These services support VHA's rent reform activities.</p> <p>VHA may use the funding flexibility to fund resident services at specific properties serving high-needs populations such as Lincoln Place I and II, The Pacific, The Elwood, The Meridian, Meriwether Place, Rhododendron Place, Caples Terrace, Nam'u qas, and Central Park Place. VHA will not use funding flexibility for the development of Lincoln Place II.</p> <p>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.</p> <p>VHA is using single fund flexibility to transfer existing RAD PBV units from their current locations to new sites. The funds are being used to bring the contract rents up to a sustainable level at the transferred sites.</p>

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	\$0	\$0
HCV Admin Fee	\$0	\$0
PH Operating Subsidy	\$0	\$0
TOTAL:	\$0	\$0

DESCRIPTION OF PLANNED EXPENDITURE OF UNSPENT OPERATING FUND AND HCV FUNDING
N/A

v. Local Asset Management Plan

- i. Is the MTW PHA allocating costs within statute?

Yes

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

No

- ii. Has the MTW PHA provided a LAMP in the appendix?

N/A

- iii. 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.

N/A

vi. Rental Assistance Demonstration (RAD) Participation

- i. Description of RAD Participation

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION
VHA will pursue Faircloth to RAD for up to 363 units.
- 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 Plan was made available for public comment beginning on August 12, 2024, by legal notice in The Columbian and publication on VHA’s website www.vhausa.org. VHA met with our Resident Advisory Board (RAB) on July 17, 2024, to review the proposed Annual MTW Plan for 2025. The Plan was also provided to the RAB on August 12, 2024, for discussion and comment.

A Public Hearing was held on September 11, 2024. VHA staff Jamie Schau attended. There were no attendees from the general public. No comments were received via email, US mail, or phone.

C. Planned and Ongoing Evaluations

VHA does not currently have any ongoing agency directed evaluations of the MTW program or activities and is not planning any for the Plan year.

D. Lobbying Disclosures

Signed copies of lobbying disclosures are attached as Appendix B.

E. Other Document and/or Certification Requirements

Signed copies of Form HUD 50077-SL, Certifications by City and County Officials of PHA Plan Consistency with the Consolidated Plan, are attached as Appendix C.

APPENDIX A: BOARD RESOLUTION AND CERTIFICATIONS OF COMPLIANCE

HOUSING AUTHORITY OF THE CITY OF VANCOUVER

CLARK COUNTY WASHINGTON

RESOLUTION NO. 3561

**RESOLUTION TO APPROVE THE MOVING TO WORK ANNUAL PLAN
FOR FISCAL YEAR 2025**

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 2025 has been prepared and made available for public comment for thirty days and a public hearing was held on September 11, 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 2025 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 26th day of September 2024.



JOAN CALEY, Chair

ATTEST:



ANDY SILVER, Secretary-Treasurer

OMB Approval No. 2577-0216 (exp. 08/31/2027)

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 (01/01/2025), 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 (42 USC 2000d-1), the Fair Housing Act (42 USC 3601 et seq.), section 504 of the Rehabilitation Act of 1973 (29 USC 794), title II of the Americans with Disabilities Act of 1990 (42 USC 12131 et seq.), the Violence Against Women Act (34 USC 12291 et seq.), all regulations implementing these authorities; and other applicable Federal, State, and local fair housing and civil rights laws.
- (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 signed certification by the appropriate State or local official (form HUD-50077-SL) that the Plan is consistent with the applicable Consolidated Plan, which includes any applicable fair housing goals or strategies, for the PHA's jurisdiction and a description of the way the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
- (7) The MTW PHA will affirmatively further fair housing in compliance with the Fair Housing Act, 24 CFR 5.150 et. seq, 24 CFR 903.7(o), and 24 CFR 903.15, which means that it will take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing requires meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws (24 CFR 5.151). The MTW PHA certifies that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing.
- (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 the Fair Housing Act and Act's prohibition on sex discrimination, which includes sexual orientation and gender identity, and 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not base a determination of eligibility for housing based on actual or perceived sexual orientation, gender identity, or marital status and will not otherwise discriminate because of sex (including sexual orientation and gender identity), 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 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: Certifications of Compliance

OMB Approval No. 2577-0216 (exp. 08/31/2027)

- (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, 31 U.S.C. § 1352.
- (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 200.334 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 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards), as applicable.
- (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 and should be made available electronically, upon request.

Housing Authority of the City of Vancouver
MTW PHA NAME

WA008
MTW PHA NUMBER/PHA CODE

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).

Joan Caley
NAME OF AUTHORIZED OFFICIAL

VHA Board Chair
TITLE


SIGNATURE

9/26/2024
DATE

* *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.*

APPENDIX B: LOBBYING DISCLOSURES

DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C.1352 OMB Number: 4040-0013
Expiration Date: 02/28/2025

1. * Type of Federal Action: <input type="checkbox"/> a. contract <input checked="" type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	2. * Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input checked="" type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. * Report Type: <input checked="" type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> SubAwardee * Name: <input type="text" value="Vancouver Housing Authority"/> * Street 1: <input type="text" value="2500 Main St."/> * Street 2: <input type="text"/> * City: <input type="text" value="Vancouver"/> * State: <input type="text" value="WA: Washington"/> * Zip: <input type="text" value="98660"/> Congressional District, if known: <input type="text" value="3rd"/>		
5. If Reporting Entity in No.4 is Subawardee, Enter Name and Address of Prime: <div style="border: 1px solid black; height: 40px;"></div>		
6. * Federal Department/Agency: <input type="text" value="US Dept. of Housing & Urban Development"/>	7. * Federal Program Name/Description: <input type="text"/> CFDA Number, if applicable: <input type="text"/>	
8. Federal Action Number, if known: <input type="text"/>	9. Award Amount, if known: \$ <input type="text"/>	
10. a. Name and Address of Lobbying Registrant: Prefix <input type="text"/> * First Name <input type="text" value="n/a"/> Middle Name <input type="text"/> * Last Name <input type="text" value="n/a"/> Suffix <input type="text"/> * Street 1 <input type="text"/> * Street 2 <input type="text"/> * City <input type="text"/> * State <input type="text"/> * Zip <input type="text"/>		
b. Individual Performing Services (including address if different from No. 10a) Prefix <input type="text"/> * First Name <input type="text" value="n/a"/> Middle Name <input type="text"/> * Last Name <input type="text" value="n/a"/> Suffix <input type="text"/> * Street 1 <input type="text"/> * Street 2 <input type="text"/> * City <input type="text"/> * State <input type="text"/> * Zip <input type="text"/>		
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when the transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.		
* Signature: * Name: Prefix <input type="text"/> * First Name <input type="text" value="Andy"/> Middle Name <input type="text"/> * Last Name <input type="text" value="Silver"/> Suffix <input type="text"/> Title: <input type="text" value="Chief Executive Officer"/> Telephone No.: <input type="text" value="360-993-9560"/> Date: <input type="text" value="10/01/2024"/>		
Federal Use Only:		Authorized for Local Reproduction Standard Form - LLL (Rev. 7-97)

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



Date (mm/dd/yyyy)

10/01/2024

APPENDIX C: CERTIFICATIONS BY CITY AND COUNTY OFFICIALS OF PHA PLAN CONSISTENCY WITH THE CONSOLIDATED PLAN

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan (All PHAs)	U. S Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 3/31/2024
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Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan

I, Samantha Whitley, the Housing Programs Manager
Official's Name Official's Title

certify that the 5-Year PHA Plan for fiscal years _____ and/or Annual PHA Plan for fiscal year 2025 of the Housing Authority of the City of Vancouver is consistent with the
PHA Name

Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

City of Vancouver, WA

Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR § 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or State Consolidated Plan.

The PHA Plan goals and objectives link directly to specific goals of the City of Vancouver's 2024-2028 Consolidated Plan and its Assessment of Fair Housing, drafted in 2019, particularly around expanding affordable housing supply and increasing prosperity to empower residents.

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: Samantha Whitley	Title: Housing Programs Manager
Signature:	Date: 09/27/2024

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

<p>Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan (All PHAs)</p>	<p>U. S Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 3/31/2024</p>
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**Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan**

I, Michael A. Torres, the Community Action, Housing, and Development Manager
Official's Name *Official's Title*

certify that the 5-Year PHA Plan for fiscal years _____ and/or Annual PHA Plan for fiscal year 2025 of the Housing Authority of the City of Vancouver is consistent with the
PHA Name

Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

Clark County, WA


Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR § 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or State Consolidated Plan.

The PHA Plan goals and objectives link directly to the Clark County 2020-2024 Consolidated Plan and its Assessment of Fair Housing, drafted in 2019, specifically as it applies to expanding affordability of housing throughout the County and its Cities; as well as encouraging and supporting equal access to housing for rental and homeowners.

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:	Title:
Michael A. Torres	Community Action, Housing, and Development Manager
Signature: 	Date: 9/27/2024

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq, and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

APPENDIX D: 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. Replacement of Medical Expense Deduction (Activity 2009-10)
2. Alternative TTP Calculation (Activity 2015-02)

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.

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.

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 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 rent plus actual monthly utility costs must exceed 50% of their calculated income.
3. The family's combined non-essential expenses cannot be more than 20% of their calculated 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 when determining a hardship.

Hardship Exemption Requests

VHA 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 Chief Executive Officer. 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.