

# PHA Name : Washington County (OR)

**PHA Code :** OR022

**MTW Supplement for PHA Fiscal Year Beginning :** (MM/DD/YYYY): 7/1/2023

**PHA Program Type:** Combined

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

**MTW Supplement Submission Type:** Annual Submission

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

### **LONG-TERM MTW GOALS**

The Housing Authority of Washington County (HAWC) is framing our MTW strategies to align with the goals stated in our Agency Plan: 1) Increase the availability of decent safe, and affordable housing; 2) improve community quality of life and economic vitality; 3) promote self-sufficiency and asset development of families and individuals; and 4) ensure equal opportunity in housing for all in our community. The flexibility offered by the MTW program enables HAWC to implement and test strategies that move the agency closer to these goals.

Throughout our participation as an MTW agency, HAWC will explore strategies for cost reduction and effectiveness. We will shift focus from paperwork and verifications to improving household outcomes. With the innovation and flexibility offered by MTW participation, we will encourage our staff and community partners to think outside the box and find ways to improve and streamline processes.

HAWC will also build on our efforts to partner and create leverage points for both services and housing development. We will think creatively on how to increase the number of units available to our low-income households, while also entering into partnerships that will help our residents improve their opportunities in education, increasing their earnings and meeting goals for their families.

HAWC is committed to centering equity and inclusion in the work we do, to include policies or processes that are considered or changed within the scope of MTW. We will examine practices with a lens toward equity, and engage our households and community partners, with specific outreach to communities of color and tribal communities that have often been excluded from the decision-making process.

### **SHORT-TERM MTW GOALS**

In our first years as an MTW agency, HAWC has focused on strategies for cost reduction and administrative effectiveness. In Year 1 we implemented a triennial review schedule for seniors and people with disabilities and simplified multiple aspects of the rent calculation. Changes like these create efficiencies for our staff and better understanding and transparency for the households we serve.

Our second year strategies expand on these approaches. We are proposing a simplified utility allowance schedule and a locally designed payment standard that takes into account the differences between market rate and affordable units. Both of these activities are designed to consider the conditions of our local community and respond to housing stability needs.

We will also continue to enroll families in the Tiered Rent Program demonstration this year. We are hopeful that families who are selected for this program will see an opportunity to increase earnings and decrease paperwork burdens, through the tiered rent schedule and triennial reviews. We look forward to learning from this six-year demonstration and building a future rent calculation that works well for all of our families.

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

<b>1. Tenant Rent Policies</b>	
a. Tiered Rent (PH)	Currently Implementing
b. Tiered Rent (HCV)	Currently Implementing
i. Alternative Utility Allowance (PH)	Plan to Implement in the Submission Year
j. Alternative Utility Allowance (HCV)	Plan to Implement in the Submission Year
r. Elimination of Deduction(s) (PH)	Currently Implementing
s. Elimination of Deduction(s) (HCV)	Currently Implementing
t. Standard Deductions (PH)	Currently Implementing
u. Standard Deductions (HCV)	Currently Implementing
v. Alternative Income Inclusions/Exclusions (PH)	Currently Implementing
w. Alternative Income Inclusions/Exclusions (HCV)	Currently Implementing
<b>2. Payment Standards and Rent Reasonableness</b>	
b. Payment Standards- Fair Market Rents (HCV)	Plan to Implement in the Submission Year
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing
<b>3. Reexaminations</b>	
a. Alternative Reexamination Schedule for Households (PH)	Currently Implementing
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
<b>4. Landlord Leasing Incentives</b>	
<b>5. Housing Quality Standards (HQS)</b>	
a. Pre-Qualifying Unit Inspections (HCV)	Currently Implementing
c. Third-Party Requirement (HCV)	Currently Implementing
d. Alternative Inspection Schedule (HCV)	Currently Implementing
<b>6. Short-Term Assistance</b>	
<b>7. Term-Limited Assistance</b>	
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	
<b>9. Project-Based Voucher Program Flexibilities</b>	
a. Increase PBV Program Cap (HCV)	Currently Implementing
b. Increase PBV Project Cap (HCV)	Currently Implementing
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Currently Implementing
h. Limit Portability for PBV Units (HCV)	Currently Implementing
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
<b>11. MTW Self-Sufficiency Program</b>	
<b>12. Work Requirement</b>	
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
<b>14. Moving on Policy</b>	
a. Waive Initial HQS Inspection Requirement (HCV)	Currently Implementing
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
<b>17. Local, Non-Traditional Activities</b>	

**C. MTW Activities Plan that Washington County (OR) Plans to Implement in the Submission Year or Is Currently Implementing**

<b>1.a. - Tiered Rent (PH)</b>
<b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b> Originally approved in the FY2022 PHA Plan.
As part of our MTW designation, HAWC will implement a tiered rent program to simplify the way rents are calculated for

households. This is part of a rent study with three other MTW agencies and will only apply to a small portion of our households. The initial program is for six years and will begin enrolling households in FY 2022-2023. The program will enroll current households and newly admitted for 12 months. After six years, any participating households will transition back to the traditional rent calculation or to a revised calculation that would be introduced to the community in the future.

Only households who are work-able are considered eligible for the Tiered Rent Program. Households where the head, co-head or spouse is age 56 or older or a person with disabilities are not eligible. Households participating in FSS, mixed-eligibility households, and households using special purpose vouchers are not eligible.

Households will be selected randomly for participation by the research firm's website. Of the households that are eligible, approximately half will be selected for the Tiered Rent Program and half will be selected as comparison households. Comparison households will continue to have their rents calculated using the standard calculation.

Under the Tiered Rent Program, households will pay rent based on a rent schedule with tiers of \$2,500 corresponding to the household's gross income (as described in Waivers 1.r. and 1.s.) Rents are set at 28% of the midpoint of each tier. Although the Tiered Rent Program uses gross income, hardship policies have been established to protect families that will lose significant deductions. See the attached Hardship Policy information for more detail.

As described in Waivers 3.a. and 3.b., households that are selected for the Tiered Rent Program will move to a triennial recertification schedule. This means that these households will only complete a full review of income and rent adjustment once every three years. Households on the Tiered Rent Program who have an increase in income between reviews will not need to report that increase in income, and will stay on the same rent payment amount until their next full review. Households that have a decrease in income between reviews can contact the agency to request a hardship review.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. (Safe Harbor Waiver requested. See below)
- ii. The agency must adopt a flat rent and/or TTP (as applicable) policy within each income band instead of calculating rent based on adjusted or gross income.

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

Cost effectiveness; Self-sufficiency

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

Decreased revenue; Increased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

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

Other – another specifically defined target population or populations.

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

This activity applies to all public housing tenants, tenant-based vouchers and project-based vouchers where the participants are non-elderly, non-disabled, and otherwise considered eligible.

**Does the MTW activity apply to all public housing developments?**

The MTW activity applies to all developments

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

HAWC began enrolling eligible households in the Tiered Rent Program in January 2023. Enrollment will continue through December 2023, and HAWC will work closely with HUD and the independent research team led by MDRC to monitor impacts. At this point there have been no changes to the activity.

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

Yes

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

The waiver was previously approved.

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

The standard MTW waiver provides that when a tiered rent is adopted, TTP/rent is based on the income at the bottom of the tier. For the Tiered Rent Program, the study design has established TTP/rent at 28% of the midpoint of the tier.

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

Income bands are in increments of \$2,500 in gross annual income. Rents are set at 28% of the midpoint of the tier, divided by 12 (to represent monthly income/rent). Households with income below \$2,500 will pay a minimum rent of \$50.

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

This document is attached.

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

This activity uses a different definition of income because we are using the following MTW waivers (check all that apply)  
1.r. and/or 1.s. "elimination of deductions"

**1.b. - Tiered Rent (HCV)**

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

Originally approved in the FY2022 PHA Plan.

As part of our MTW designation, HAWC will implement a tiered rent program to simplify the way rents are calculated for households. This is part of a rent study with three other MTW agencies and will only apply to a small portion of our households. The initial program is for six years and will begin enrolling households in FY 2022-2023. The program will enroll current households and newly admitted for 12 months. After six years, any participating households will transition back to the traditional rent calculation or to a revised calculation that would be introduced to the community in the future.

Only households who are work-able are considered eligible for the Tiered Rent Program. Households where the head, co-head or spouse is age 56 or older or a person with disabilities are not eligible. Households participating in FSS, mixed-eligibility households, and households using special purpose vouchers are not eligible.

Households will be selected randomly for participation by the research firm's website. Of the households that are eligible, approximately half will be selected for the Tiered Rent Program and half will be selected as comparison households. Comparison households will continue to have their rents calculated using the standard calculation.

Under the Tiered Rent Program, households will pay rent based on a rent schedule with tiers of \$2,500 corresponding to the household's gross income (as described in Waivers 1.r. and 1.s.) Rents are set at 28% of the midpoint of each tier. Although the Tiered Rent Program uses gross income, hardship policies have been established to protect families that will lose significant deductions. See the attached Hardship Policy information for more detail.

As described in Waivers 3.a. and 3.b., households that are selected for the Tiered Rent Program will move to a triennial recertification schedule. This means that these households will only complete a full review of income and rent adjustment once every three years. Households on the Tiered Rent Program who have an increase in income between reviews will not need to report that increase in income, and will stay on the same rent payment amount until their next full review. Households that have a decrease in income between reviews can contact the agency to request a hardship review.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. (Safe Harbor Waiver requested. See below)
- ii. The agency must adopt a flat rent and/or TTP (as applicable) policy within each income band instead of calculating rent based on adjusted or gross income.

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

Cost effectiveness; Self-sufficiency

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

Decreased revenue; Increased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

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

Other – another specifically defined target population or populations.

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

This activity applies to all public housing tenants, tenant-based vouchers and project-based vouchers where the participants are non-elderly, non-disabled, and otherwise considered eligible.

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

The MTW activity applies to all tenant-based units

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

HAWC began enrolling eligible households in the Tiered Rent Program in January 2023. Enrollment will continue through December 2023, and HAWC will work closely with HUD and the independent research team led by MDRC to monitor impacts. At this point there have been no changes to the activity.

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

Yes

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

The waiver was previously approved.

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

The standard MTW waiver provides that when a tiered rent is adopted, TTP/rent is based on the income at the bottom of the tier. For the Tiered Rent Program, the study design has established TTP/rent at 28% of the midpoint of the tier.

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

Income bands are in increments of \$2,500 in gross annual income. Rents are set at 28% of the midpoint of the tier, divided by 12 (to represent monthly income/rent). Households with income below \$2,500 will pay a minimum rent of \$50.

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

This document is attached.

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

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

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

**1.i. - Alternative Utility Allowance (PH)**

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

HAWC is requesting a waiver to create an alternative utility allowance schedule for public housing and voucher units. The current utility allowance is extensive and difficult for tenants to use. Simplifying the utility allowance schedule will help tenants to understand the full costs of potential units, will create administrative efficiencies, and will reduce likelihood of calculation errors.

HAWC will create a utility allowance schedule that considers location, bedroom size, and only whether the household pays heat/electricity and water/sewer/garbage.

Upon implementation and moving forward, updates to the household's utility allowances will be applied at the household's next regularly scheduled review or update.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. The utility schedule must be based upon number of bedrooms, the property location, and/or the types of utilities paid by participant.
- ii. The agency must review its schedule of utility allowances each year and revise its allowance for a utility category if there has been a change of 10 percent or more of the cost from the prior year. The agency must maintain information supporting its annual review of utility allowances and any revisions made in its utility allowance schedule.
- iii. The agency must not include items in the utility schedule that are excluded under HUD regulations.

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

Cost effectiveness

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

No

**Please describe the alternative method of calculating the utility allowances. Please explain how the method of calculating utility allowances is different from the standard method and what objective the MTW agency aims to achieve by using this alternative method.**

HAWC will create a simplified utility allowance schedule that considers location, bedroom size and only whether the household pays heat/electricity and water/sewer/garbage. Simplifying the utility allowance schedule will help tenants to understand the full costs of potential units, will create administrative efficiencies, and will reduce likelihood of calculation errors.

### 1.j. - Alternative Utility Allowance (HCV)

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

HAWC is requesting a waiver to create an alternative utility allowance schedule for public housing and voucher units. The current utility allowance is extensive and difficult for tenants to use. Simplifying the utility allowance schedule will help tenants to understand the full costs of potential units, will create administrative efficiencies, and will reduce likelihood of calculation errors.

HAWC will create a utility allowance schedule that considers location, bedroom size, and only whether the household pays heat/electricity and water/sewer/garbage.

Upon implementation and moving forward, updates to the household's utility allowances will be applied at the household's next regularly scheduled review or update.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. The utility schedule must be based upon number of bedrooms, the property location, and/or the types of utilities paid by participant.
- ii. The agency must review its schedule of utility allowances each year and revise its allowance for a utility category if there has been a change of 10 percent or more of the cost from the prior year. The agency must maintain information supporting its annual review of utility allowances and any revisions made in its utility allowance schedule.
- iii. The agency must not include items in the utility schedule that are excluded under HUD regulations.

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

Cost effectiveness

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

No



**Please describe the alternative method of calculating the utility allowances. Please explain how the method of calculating utility allowances is different from the standard method and what objective the MTW agency aims to achieve by using this alternative method.**

HAWC will create a simplified utility allowance schedule that considers location, bedroom size and only whether the household pays heat/electricity and water/sewer/garbage. Simplifying the utility allowance schedule will help tenants to understand the full costs of potential units, will create administrative efficiencies, and will reduce likelihood of calculation errors.

**1.r. - Elimination of Deduction(s) (PH)**

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

Originally approved in the FY2022 PHA Plan.

As described in 1.a. and 1.b., the Tiered Rent Program will utilize a rent schedule based on \$2,500 bands of the household's gross income. Households who are selected for this program will have their rent calculated using gross income from the prior twelve months (except for new admissions, who will have their rent calculated using current gross income). As a part of the policy, deductions and allowances will not be included in the calculation of gross income.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. Agency must conduct an impact analysis.
- ii. Agency must exempt elderly and disabled families from rent policy.
- iii. Agency must implement a hardship policy.

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

Cost effectiveness

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

Decreased revenue; Increased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

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

Other – another specifically defined target population or populations.

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

This activity applies to all public housing tenants, tenant-based vouchers and project-based vouchers where the participants are non-elderly, non-disabled, and otherwise considered eligible.

**Does the MTW activity apply to all public housing developments?**

The MTW activity applies to all developments

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

HAWC began enrolling eligible households in the Tiered Rent Program in January 2023. Enrollment will continue through December 2023, and HAWC will work closely with HUD and the independent research team led by MDRC to monitor impacts. At this point there have been no changes to the activity.

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

Yes

This document is attached.

**Does the hardship policy apply to more than this MTW activity?**

Yes

**Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)**

1.r. - Elimination of Deduction(s) (PH); 1.s. - Elimination of Deduction(s) (HCV); 3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)

**Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**

No

**How many hardship requests have been received associated with this activity in the past year?**

No hardship were requested in the most recent fiscal year.

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

No

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

Provided Already

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

Dependent allowance; Unreimbursed childcare costs; Other

**Other (please explain)**

All deductions, including dependent allowances and deductions for childcare costs, will be eliminated for households participating in the Tiered Rent Program. Families who experience a significant rent increase due to the loss of these deductions may be eligible for hardship and adjustment to their rent calculation.

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

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

Originally approved in the FY2022 PHA Plan.

As described in 1.a. and 1.b., the Tiered Rent Program will utilize a rent schedule based on \$2,500 bands of the household's gross income. Households who are selected for this program will have their rent calculated using gross income from the prior twelve months (except for new admissions, who will have their rent calculated using current gross income). As a part of the policy, deductions and allowances will not be included in the calculation of gross income.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. Agency must conduct an impact analysis.
- ii. Agency must exempt elderly and disabled families from rent policy.
- iii. Agency must implement a hardship policy.

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

Cost effectiveness

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

Decreased revenue; Increased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

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

Other – another specifically defined target population or populations.

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

This activity applies to all public housing tenants, tenant-based vouchers and project-based vouchers where the participants are non-elderly, non-disabled, and otherwise considered eligible.

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

The MTW activity applies to all tenant-based units

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

HAWC began enrolling eligible households in the Tiered Rent Program in January 2023. Enrollment will continue through December 2023, and HAWC will work closely with HUD and the independent research team led by MDRC to monitor impacts. At this point there have been no changes to the activity.

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

Yes

This document is attached.

**Does the hardship policy apply to more than this MTW activity?**

Yes

**Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)**

1.r. - Elimination of Deduction(s) (PH); 1.s. - Elimination of Deduction(s) (HCV); 3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)

**Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**

No

**How many hardship requests have been received associated with this activity in the past year?**

5.00

**How many hardship requests were approved?**

5

**How many hardship requests were denied?**

0

**How many are pending?**

0

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

No

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

Provided Already

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

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

**Other (please explain)**

All deductions, including dependent allowances and deductions for childcare costs, will be eliminated for households participating in the Tiered Rent Program. Families who experience a significant rent increase due to the loss of these deductions may be eligible for hardship and adjustment to their rent calculation.

### **1.t. - Standard Deductions (PH)**

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

Originally approved in the FY2022 PHA Plan.

HAWC is requesting MTW flexibility to simplify the calculation of the medical or disability expense deduction, the process of verifying expenses, and how those expenses will impact a household's rent.

HAWC will use a simplified table (below) to calculate allowances related to a household's medical or disability expenses. We will no longer use a varying medical or disability expense threshold for households. In essence, we will take the full amount of the household's expense and round down to the nearest \$1,000 to calculate their deduction. Only medical or disability expenses totaling \$1,500 or more per year are eligible.

Medical /disability expense information can only be submitted once every 12 months. Interim reviews will not recalculate medical expenses. Households will submit medical expense information via a form. For expenses totaling less than \$5,000, HAWC will use tenant self-certification. Receipts will be required for expenses totaling \$5,000 or more.

**Medical / Disability expense - Deduction**

- \$0 - \$1,500 \$0
- \$1,500 - \$1,999 \$1,000
- \$2,000 - \$2,999 \$2,000
- \$3,000 - \$3,999 \$3,000
- \$4,000 - \$4,999 \$4,000
- \$5,000 - \$5,999 \$5,000
- \$6,000 - \$6,999 \$6,000
- \$7,000 - \$7,999 \$7,000
- \$8,000 - \$8,999 \$8,000
- \$9,000 - \$9,999 \$9,000

This activity will apply to all new and existing households included in MTW flexibility, including Public Housing, Housing Choice Voucher and Project-Based Voucher households. Please note that households participating in the Tiered Rent Program will no longer have deductions included in their rent calculation, and will therefore not be subject to this change.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

HAWC received approval on March 8, 2023 and will implement in coming months.

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

Yes

This document is attached.

**Does the hardship policy apply to more than this MTW activity?**

Yes

**Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)**

2.b. - Payment Standards- Fair Market Rents (HCV)

**Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**

No

**How many hardship requests have been received associated with this activity in the past year?**

No hardship were requested in the most recent fiscal year.

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

No

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

Provided Already

**How much will the single standard deduction be in the Fiscal Year?**

\$0

**1.u. - Standard Deductions (HCV)**

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

Originally approved in the FY2022 PHA Plan.

HAWC is requesting MTW flexibility to simplify the calculation of the medical or disability expense deduction, the process of verifying expenses, and how those expenses will impact a household's rent.

HAWC will use a simplified table (below) to calculate allowances related to a household's medical or disability expenses. We will no longer use a varying medical or disability expense threshold for households. In essence, we will take the full amount of the household's expense and round down to the nearest \$1,000 to calculate their deduction. Only medical or disability expenses totaling \$1,500 or more per year are eligible.

Medical /disability expense information can only be submitted once every 12 months. Interim reviews will not recalculate medical expenses. Households will submit medical expense information via a form. For expenses totaling less than \$5,000, HAWC will use tenant self-certification. Receipts will be required for expenses totaling \$5,000 or more.

Medical / Disability expense - Deduction

\$0 - \$1,500	\$0
\$1,500 - \$1,999	\$1,000
\$2,000 - \$2,999	\$2,000
\$3,000 - \$3,999	\$3,000
\$4,000 - \$4,999	\$4,000
\$5,000 - \$5,999	\$5,000
\$6,000 - \$6,999	\$6,000
\$7,000 - \$7,999	\$7,000
\$8,000 - \$8,999	\$8,000
\$9,000 - \$9,999	\$9,000

This activity will apply to all new and existing households included in MTW flexibility, including Public Housing, Housing Choice Voucher and Project-Based Voucher households. Please note that households participating in the Tiered Rent Program will no longer have deductions included in their rent calculation, and will therefore not be subject to this change.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

HAWC received approval on March 8, 2023 and will implement in coming months.

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

Yes

This document is attached.

**Does the hardship policy apply to more than this MTW activity?**

Yes

**Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)**

**Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**

No

**How many hardship requests have been received associated with this activity in the past year?**

No hardship were requested in the most recent fiscal year.

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

No

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

Provided Already

**How much will the single standard deduction be in the Fiscal Year?**

\$0

#### **1.v. - Alternative Income Inclusions/Exclusions (PH)**

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

Originally approved in the FY2022 PHA Plan.

The calculation of asset income and how it affects a household's rent is often arduous and confusing. Across 2,256 households currently reporting assets, the average annual impact on household rent is \$3.56 per household, per year. The staff time required to collect, verify and calculate asset information is of significant more cost than this.

HAWC has implemented a change the way assets are used to calculate rent. Asset information will still be collected and verified at initial eligibility. However, HAWC will disregard all assets when total assets for the household are less than \$100,000. HAWC will not include asset or asset income in the rent calculation, or enter the information into Yardi, if total assets are less than \$100,000 as indicated in the personal declaration packet. If assets are \$100,000 or more, HAWC will continue to process assets and calculate the impact on rent as usual.

Out of 2,256 households currently reporting assets, only 21 households (or 1%) have assets of \$100,000 or more. The total impact of those assets represents 65% of the difference in final rent calculations across the agency. Continuing to include assets of \$100,000 or more will ensure that households with significant asset income use a portion of that income toward their rent.

This activity will apply to all new and existing households included in MTW flexibility, including Public Housing, Housing Choice Voucher and Project-Based Voucher households. (Safe Harbor Waiver requested.)

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

Cost effectiveness

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

Decreased revenue; Increased expenditures

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

The MTW activity applies to all assisted households

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

HAWC received approval on March 8, 2023 and will implement in coming months.

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

Yes

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

The waiver was previously approved.

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

This activity will apply to both work-able and elderly and/or disabled households.

**What inclusions or exclusions will be eliminated, modified, or added?**

Asset income: HAWC will disregard asset income when total assets for the household are less than \$100,000.

**1.w. - Alternative Income Inclusions/Exclusions (HCV)**

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

Originally approved in the FY2022 PHA Plan.

The calculation of asset income and how it affects a household's rent is often arduous and confusing. Across 2,256 households currently reporting assets, the average annual impact on household rent is \$3.56 per household, per year. The staff time required to collect, verify and calculate asset information is of significant more cost than this.

HAWC has implemented a change the way assets are used to calculate rent. Asset information will still be collected and verified at initial eligibility. However, HAWC will disregard all assets when total assets for the household are less than \$100,000. HAWC will not include asset or asset income in the rent calculation, or enter the information into Yardi, if total assets are less than \$100,000 as indicated in the personal declaration packet. If assets are \$100,000 or more, HAWC will continue to process assets and calculate the impact on rent as usual.

Out of 2,256 households currently reporting assets, only 21 households (or 1%) have assets of \$100,000 or more. The total impact of those assets represents 65% of the difference in final rent calculations across the agency. Continuing to include assets of \$100,000 or more will ensure that households with significant asset income use a portion of that income toward their rent.



This activity will apply to all new and existing households included in MTW flexibility, including Public Housing, Housing Choice Voucher and Project-Based Voucher households. (Safe Harbor Waiver requested.)

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

Cost effectiveness

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

Decreased revenue; Increased expenditures

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

The MTW activity applies to all assisted households

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

HAWC received approval on March 8, 2023 and will implement in coming months.

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

Yes

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

The waiver was previously approved.

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

This activity will apply to both work-able and elderly and/or disabled households.

**What inclusions or exclusions will be eliminated, modified, or added?**

Asset income: HAWC will disregard asset income when total assets for the household are less than \$100,000.

**2.b. - Payment Standards- Fair Market Rents (HCV)**

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

To best meet the local needs of our community, the Housing Authority of Washington County is requesting a waiver that allows us to adopt and implement local policies to establish payment standards based on Fair Market Rents (FMR).

In FY2023-24, HAWC will create and apply two different voucher payment standards:

Market Rate Voucher Payment Standard will generally apply to units in the private rental market. These payment standards will be set between 100% and 110% of area Fair Market Rents.

Affordable Housing Voucher Payment Standards will generally apply to units with a nonprofit or tax credit status. These payment standards will be set between 90% and 100% of area Fair Market Rents.

At adoption of these differing payment standards, the Affordable Housing Voucher Payment Standard will start at our current rate so no household will have a reduction of VPS.

Adjustments to payment standards will be applied at the household's move in, recertification, or contract rent increase.

Payment standards impact all voucher subsidy holders as it is factored in the maximum subsidy. Since affordable housing units have other regulations to keep rents lower, we anticipate there will be no reduction in assistance or rent amounts while renting an affordable housing unit. This will also open more opportunities to rent units above market rent if they are

privately owned.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. Payment standard must be between 80% and 120% of the FMR.
- ii. Agency must implement an impact analysis.
- iii. Agency must implement a hardship policy.

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

Cost effectiveness; Housing choice

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

Yes

This document is attached.

**Does the hardship policy apply to more than this MTW activity?**

No

**Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**

No

**How many hardship requests have been received associated with this activity in the past year?**

No hardship were requested in the most recent fiscal year.

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

No

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

Yes

This document is attached.

**Does the impact analysis apply to more than this MTW activity?**

No

**Please explain the payment standards by FMR:**

Market Rate Voucher Payment Standard will generally apply to units in the private rental market. These payment standards will be set between 100% and 110% of area Fair Market Rents.

Affordable Housing Voucher Payment Standards will generally apply to units with a nonprofit or tax credit status. These payment standards will be set between 90% and 100% of area Fair Market Rents.

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

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

Originally approved in the FY2022 PHA Plan.

HAWC is proposing to eliminate the requirement for a third party to conduct rent reasonableness on units our agency owns or controls, assisted with project-based vouchers. HAWC currently engages a third-party contractor to conduct rent reasonableness in these cases, and it is time consuming and costly. Conducting rent reasonableness calculations internally will streamline processes and create cost effectiveness. HAWC will utilize GoSection8 Rent Reasonableness software for all rent reasonableness processes to ensure quality control and transparency. The program allows Quality Control reviews of the rent reasonableness in which an auditor has access to perform quality control audits on the rent reasonableness determination. Rent reasonableness documentation with comparable will still be transmitted to HUD for Subsidy Layering Reviews.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. The agency shall establish and make available a quality assurance method to ensure impartiality.
- ii. The agency shall make available the method used to determine that rents charged by owners to voucher participants are reasonable when compared to similar unassisted units in the market area.
- iii. At the Department's request, the agency must obtain the services of a third-party entity to determine rent

reasonableness for PHA-owned units.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

During implementation, rent reasonableness has been completed for all PHA owned units utilizing the Affordable

Housing/GoSection8 website.

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

No

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

The GoSection8 Rent Reasonableness software program allows for quality control reviews of the rent reasonableness in which an auditor has access to perform quality control audits on the rent reasonableness determination. Rent

reasonableness documentation with comparable will still be transmitted to HUD for Subsidy Layering Reviews.

No document is attached.

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

HAWC will utilize GoSection8 Rent Reasonableness software for all rent reasonableness processes. The process includes

comparable based on up-to-date market units and costs. The software's processes and certification of each review adheres to HUD's rent reasonableness standards.

No document is attached.

### **3.a. - Alternative Reexamination Schedule for Households (PH)**

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

Originally approved in the FY2022 PHA Plan.

HAWC is utilizing 3.a. in two activities: Tiered Rent Program and Triennial Reviews for Seniors and People with Disabilities. Utilization of the waiver in each activity is described below.

#### **Tiered Rent Program**

As described in 1.a. and 1.b., the Tiered Rent Program will utilize a rent schedule based on \$2,500 bands of the household's gross income. Households who are selected for this program will move to a triennial recertification schedule. These households will only complete a full review of income and rent adjustment once every three years. Households on the Tiered Rent Program who have an increase in income between reviews will not need to report that increase in income, and will stay on the same rent payment amount until their next full review. Households that have a decrease in income between reviews can contact the agency to request a hardship review.

The triennial review schedule will benefit families who increase their earnings. Families will not need to report increased income between triennial reviews, and will keep their full additional earnings to build stability.

#### **Triennial Reviews for Seniors and People with Disabilities.**

HAWC is implementing a triennial review schedule for seniors and people with disabilities. The triennial review schedule will be applied to households with at least one fixed income source, and where all adults in the households are seniors or people with disabilities. (At this time, both factors must apply for households to qualify for triennial reviews.)

Because this subset of our community is frequently on fixed incomes, they do not see significant rent changes from year to year. Annual reviews can be burdensome for these households. Instead, HAWC will only do a full review for these households once every three years. In 2022, households will be assigned their next review in either 2022, 2023 or 2024, and will not have another regular review for three years after. Households do not need to report changes in income between triennial reviews, unless they have a loss of income and are seeking rent reduction.

HAWC will still update COLA, payment standards, utility allowances and run EIV every year, send rent notice and informational letters to the household reminding them that they're on a triennial review, as well as a reminder to update medical expenses within 30 days if applicable.

If a household where all adults in the household are seniors or people with disabilities is zero income, they will be on a six-month review cycle. The goal of these six-month reviews will be to connect households with services or organizations who can help the household through the process of confirming SSI or SSDI income.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. Reexaminations must occur at least every three years.
- ii. The agency must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more. (Safe Harbor Waiver requested for Tiered Rent Program. See below.)
- iii. Agency must implement an impact analysis.
- iv. Agency must include a hardship policy.

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

Cost effectiveness; Self-sufficiency

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

Neutral (no cost implications)

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

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

Other – another specifically defined target population or populations.

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

Tiered Rent Program:

This activity applies to all public housing tenants, tenant-based vouchers and project-based vouchers where the participants are non-elderly, non-disabled, and otherwise considered eligible.

Triennial Reviews:

This activity applies to all public housing tenants, tenant-based vouchers and project-based vouchers where the participants are seniors or people with disabilities.

**Does the MTW activity apply to all public housing developments?**

The MTW activity applies to all developments

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

Upon approval, HAWC implemented the waiver in FY2022 and began transitioning households to a triennial review schedule in December 2022.

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

Yes

This document is attached.

**Does the hardship policy apply to more than this MTW activity?**

Yes

**Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)**

3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households

(HCV)

**Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**

No

**How many hardship requests have been received associated with this activity in the past year?**

No hardship were requested in the most recent fiscal year.

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

Yes

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

The waiver was previously approved.

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

The standard MTW waiver calls for at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more. However, the study design does not provide for interim adjustments, but instead calls for hardship rent application when a household's income decreases and falls into a lower rent tier.

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

Provided Already

**What is the recertification schedule?**

Once every three years

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

2 or more

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

Tiered Rents:

If a family experiences a decrease in income that falls into a lower tier, the family can request a hardship (as opposed to an interim recertification). Please see the hardship policy for additional details.

Triennial Reviews:

Households will have access to our standard hardship policy if they feel their current rent calculation is putting their housing stability at risk. HAWC will track and annually review the hardship requests received by these household to ensure the policy is not having a negative or bias impact on these households. Families can also request interims as needed, if the change in household circumstances warrants.

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

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

Originally approved in the FY2022 PHA Plan.

HAWC is utilizing 3.a. in two activities: Tiered Rent Program and Triennial Reviews for Seniors and People with Disabilities. Utilization of the waiver in each activity is described below.

#### Tiered Rent Program

As described in 1.a. and 1.b., the Tiered Rent Program will utilize a rent schedule based on \$2,500 bands of the household's gross income. Households who are selected for this program will move to a triennial recertification schedule. These households will only complete a full review of income and rent adjustment once every three years. Households on the Tiered Rent Program who have an increase in income between reviews will not need to report that increase in income, and will stay on the same rent payment amount until their next full review. Households that have a decrease in income between reviews can contact the agency to request a hardship review.

The triennial review schedule will benefit families who increase their earnings. Families will not need to report increased income between triennial reviews, and will keep their full additional earnings to build stability.

#### Triennial Reviews for Seniors and People with Disabilities.

HAWC is implementing a triennial review schedule for seniors and people with disabilities. The triennial review schedule will be applied to households with at least one fixed income source, and where all adults in the households are seniors or people with disabilities. (At this time, both factors must apply for households to qualify for triennial reviews.)

Because this subset of our community is frequently on fixed incomes, they do not see significant rent changes from year to year. Annual reviews can be burdensome for these households. Instead, HAWC will only do a full review for these households once every three years. In 2022, households will be assigned their next review in either 2022, 2023 or 2024, and will not have another regular review for three years after. Households do not need to report changes in income between triennial reviews, unless they have a loss of income and are seeking rent reduction.

HAWC will still update COLA, payment standards, utility allowances and run EIV every year, send rent notice and informational letters to the household reminding them that they're on a triennial review, as well as a reminder to update medical expenses within 30 days if applicable.

If a household where all adults in the household are seniors or people with disabilities is zero income, they will be on a six-month review cycle. The goal of these six-month reviews will be to connect households with services or organizations who can help the household through the process of confirming SSI or SSDI income.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. Reexaminations must occur at least every three years.
- ii. The agency must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more. (Safe Harbor Waiver requested for Tiered Rent Program. See below.)
- iii. Agency must implement an impact analysis.
- iv. Agency must include a hardship policy.

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

Cost effectiveness

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

Neutral (no cost implications)

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

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

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

The MTW activity applies to all tenant-based units

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

Upon approval, HAWC implemented the waiver in FY2022 and began transitioning households to a triennial review schedule in December 2022.

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

Provided Already

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

Yes

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

The waiver was previously approved.

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

The standard MTW waiver calls for at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more. However, the study design does not provide for interim adjustments, but instead calls for hardship rent application when a household's income decreases and falls into a lower rent tier.

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

Provided Already

**What is the recertification schedule?**

Once every three years

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

2 or more

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

Tiered Rents:

If a family experiences a decrease in income that falls into a lower tier, the family can request a hardship (as opposed to an interim recertification). Please see the hardship policy for additional details.

Triennial Reviews:

Households will have access to our standard hardship policy if they feel their current rent calculation is putting their



housing stability at risk. HAWC will track and annually review the hardship requests received by these household to ensure the policy is not having a negative or bias impact on these households. Families can also request interims as needed, if the change in household circumstances warrants.

#### 5.a. - Pre-Qualifying Unit Inspections (HCV)

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

Originally approved in the FY2022 PHA Plan.

HAWC is proposing the option to allow pre-qualifying unit inspections, within 90 days of the participant occupying the unit. Allowing pre-qualifying inspections will streamline the process and allow households to move through occupancy more quickly.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. The pre-inspection must have been conducted within 90 days of the participant occupying the unit.
- ii. The participant must be able to request an interim inspection.
- iii. HQS inspection standards must not be altered as found at 24 CFR 982.401.

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

Cost effectiveness

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

In FY2022, HAWC has utilized pre-qualifying inspections for project-based units only, specifically for newly built or rehabilitated units. Utilization of the waiver has gone well. HAWC may look to expand to tenant-based units in the future.

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

No

**How long is the pre-inspection valid for?**

The pre-inspection is valid for 90 days.

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

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

Originally approved in the FY2022 PHA Plan.

HAWC is proposing to eliminate the requirement for a third party to conduct HQS inspections on units our agency owns or controls, when assisted with tenant-based or project-based vouchers. HAWC currently engages a third-party contractor to conduct HQS inspections in these cases, and it is time consuming and costly. Using HAWC staff to conduct these HQS inspections will streamline processes and create cost effectiveness. HAWC will continue to have a sampling of inspections done by our auditor to ensure quality control and transparency in the process.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. The agency shall establish and make available a quality assurance method to ensure an objective analysis.
- ii. The participant must be able to request an interim inspection.
- iii. HQS inspection standards must not be altered as found at 24 CFR 982.401.
- iv. At the Department's request, the agency must obtain the services of a third-party entity to determine if PHA-owned units pass HQS.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

Upon approval, HAWC implemented the waiver in FY2022. This waiver has helped to streamline HQS processes and create cost effectiveness.

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

No

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

Following will explain the quality assurance method

HAWC will continue to utilize our internal quality control process of HQS audits, ensuring that a minimum amount of inspections are reviewed by a secondary staff member. The agency will conduct quality control inspections utilizing 24 CFR 985.2(b) that determines the quality control sample size, whereas the PHA will perform quality control inspections to ensure housing quality. The sample selection will be drawn in an unbiased manner and reviewed by an agency supervisor or another qualified person other than the person who performed the original work. Sample pulls may occur monthly or quarterly and notices will be sent to the participants and landlords.

No document is attached.

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

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

Originally approved in the FY2022 PHA Plan.

HAWC is proposing that in lieu of initial staff inspections of PBV units before occupancy or at turnover (per 24 CFR 983.103(b)-(c)), properties in good standing will self-certify adherence to HQS inspection standards. This policy will allow for the landlord and tenant to complete and sign a self-certification of inspection at the time of lease up, with documentation submitted at the same time as the other leasing paperwork. Once received, staff will review and if approved, place the PBV unit on an annual inspection cycle.

This policy will only apply to properties in good standing, and HAWC may require initial inspections at any PBV unit if there are concerns with failed inspections in the property. Additionally, the participant can request an interim inspection at any time. All initial inspections on a contract will be conducted by an HQS inspection, including but not limited to new

construction, rehabilitation and unit transfers. The unit must pass at least one full HQS inspection before it will be eligible for an initial self-certification.

HAWC will employ a quality control process of HQS internal audits, randomly selecting a percentage of self-certified inspections to receive a secondary inspection by internal staff. HAWC will also track interim inspection requests and results from annual inspections, to monitor if the policy is having any negative or bias impact on housing quality or residents.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. Units must be inspected at least once every three years.
- ii. The participant must be able to request an interim inspection.
- iii. HQS inspection standards as found at 24 CFR 982.401 must not be altered.
- iv. The Department must be able to conduct or direct the agency to perform an inspection at any time for health and safety, as well as accessibility, purposes.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

Due to delays in waiver approval, HAWC has not implemented at this time. Implementation is planned for late FY2022/early FY2023.

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

No

**9.a. - Increase PBV Program Cap (HCV)**

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

Originally approved in the FY2022 PHA Plan.

HAWC is proposing to increase the number of authorized units that we may project-base up to 50%. Project-based vouchers (PBVs) are an important resource in our community, allowing the agency to coordinate with local property owners, developers, service coordinators and jurisdictional partners to provide targeted housing for different populations.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. The agency must not project-base more than 50% of the lower of either the total authorized units or annual budget authority.

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

Housing choice

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

HAWC continues to utilize project-based voucher as an important resource for housing stability in our community. We currently project-base approximately 11% of our total authorized units.

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

No

**What percentage of total authorized HCV units will be authorized for project-basing?**

50.00%

### **9.b. - Increase PBV Project Cap (HCV)**

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

Originally approved in the FY2022 PHA Plan.

HAWC is proposing to increase the PBV cap within a project to 100%. Project-based vouchers (PBVs) are an important resource in our community, allowing the agency to coordinate with local property owners, developers, service coordinators and jurisdictional partners to provide targeted housing for different populations.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

i. The agency is subject to Notice PIH 2013-27 where applicable, or successor.

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

Housing choice

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

HAWC continues to utilize project-based voucher as an important resource for housing stability in our community. This waiver will create operational efficiency and expanded housing choice.

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

No

**9.c. - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)**

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

Originally approved in the FY2022 PHA Plan.

HAWC is proposing to eliminate the selection process in the award of PBVs to properties owned by the agency that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site. HAWC will continue to abide by the additional HUD selection requirements and will maintain transparency with our community.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. A subsidy layering review must be conducted.
- ii. The agency must complete site selection requirements.
- iii. (The agency is also implementing Activity 5.c. and will be waiving the third-party inspection requirements for all PBV properties. The agency has confirmed that Activity 5.c. overrides the Safe Harbor in Activity 9.c. with the MTW Office.)
- iv. The agency is subject to Notice PIH 2013-27 where applicable, or successor.
- v. Property must be owned by a single-asset entity of the agency, see Notice PIH 2017-21.

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

Housing choice

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

HAWC continues to utilize project-based voucher as an important resource for housing stability in our community. This waiver will create operational efficiency and housing choice.

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

No

**9.h. - Limit Portability for PBV Units (HCV)**

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

Originally approved in the FY2022 PHA Plan.

HAWC is proposing to change the current requirement to provide a tenant-based voucher when requested by a PBV household from 12 months after PBV tenancy to 24 months. Because of the limited availability of tenant-based vouchers in our community, we currently have a list of approximately 1,800 households waiting to access a tenant-based voucher – with many more in our community who are eligible, but not yet on any waitlist.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. Portability under this activity must not be restricted for more than 24 months.
- ii. The agency must have a clear and uniform policy in place to address how move requests are received and how they are

approved/denied for PBV households.

iii. Participants must still retain the ability to request a tenant-based voucher for reasonable accommodation according to existing rules.

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

Housing choice

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

Due to delays in waiver approval, HAWC has not implemented at this time. Implementation is planned for late FY2022/early FY2023.

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

No

#### 14.a. - Waive Initial HQS Inspection Requirement (HCV)

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

Originally approved in the FY2022 PHA Plan.

Moving On enables individuals and families who are able and want to move from permanent supportive housing (PSH) to do so by providing mainstream housing options, like public housing units or rent assistance vouchers. HAWC is utilizing our MTW authority to waive the requirement for an additional HQS inspection if the household is going to use mainstream housing options (such as a voucher) to continue to lease the same unit.

HAWC anticipates this activity will be relatively cost neutral, with some staff time savings through the policy, but significant improvements in administrative efficiency.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. Initial income eligibility must be determined in accordance with 24 CFR 5.609 of the 1937 Act.
- ii. Agencies must continue to allow participants to request an interim HQS inspection.
- iii. Any income calculations that are accepted from partner agencies must have been calculated within the last year.
- iv. Screenings for lifetime sex offender status and convictions of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing must continue and are not waivable.

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

Cost effectiveness; Housing choice

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

Upon approval, HAWC implemented the waiver in FY2022. This waiver streamlines the HQS inspection process for households that qualify.

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

No

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

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



**Agency-Specific Waiver(s) for which HUD Approval has been Received:**

**Does the MTW agency have any approved Agency-Specific Waivers?**

Yes

E.2

Title	Has there been a change in how the waiver is being implemented from when it was originally approved?	Please provide a description of what has changed.	Please provide a description of the final outcomes and lessons learned from implementing this Activity at your PHA.	If the MTW Agency was previously required to prepare an impact analysis, was a final impact analysis prepared at the time of discontinuation?
A. Income Verification D. Discontinue Earned Income Disallowance (EID) F. Waiver of Waitlist Restrictions G. Strategic Waitlists	No			
A. Income Verification D. Discontinue Earned Income Disallowance (EID) F. Waiver of Waitlist Requirements G. Strategic Waitlists	No			

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2021	\$1,004,472	\$1,004,472	\$0	2029-09-30
2022	\$1,000,068	\$1,000,068	\$0	2030-09-30
2023	\$334,171	\$258,128	\$86,043	2031-09-30

<b>G.</b>	<b>MTW Statutory Requirements.</b>	
<b>G.1</b>	<b>75% Very Low Income – Local, Non-Traditional.</b> HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	<b>Income Level</b>	<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
	80%-50% Area Median Income	
	49%-30% Area Median Income	
	Below 30% Area Median Income	
	Total Local, Non-Traditional Households	<b>0</b>

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

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

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

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

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

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

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

I.	Evaluations.
	Yes - This table lists evaluations of Washington County (OR)'s MTW activities, including the names of evaluators and available reports

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

Title and short description	Evaluator name and contact information	Time period	Reports available
HAWC's participation in the second cohort of the MTW Expansion will evaluate alternative rent policies designed to increase resident self-sufficiency and reduce administrative burdens. HAWC will be studying a tiered rent model. An independent research team led by MDRC will work with HUD, HAWC, and the other selected agencies to assist in implementation and evaluate the effects of the alternative rent policy. HAWC anticipates evaluation to run July 1, 2022 through June 30, 2028.	MDRC Contact: Nina Castells; Nina.Castells@mdrc.org	HAWC anticipates evaluation to run July 1, 2022 through June 30, 2028.	



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

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

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

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

\_\_\_\_\_  
**MTW PHA NAME**

\_\_\_\_\_  
**MTW PHA NUMBER/HA CODE**

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

\_\_\_\_\_  
**NAME OF AUTHORIZED OFFICIAL**

\_\_\_\_\_  
**TITLE**



\_\_\_\_\_  
**SIGNATURE**

\_\_\_\_\_  
**DATE**

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

H. Homeownership Program

**Previously Submitted:**

- A. Income Verification
- B. ~~Calculation of Asset Income~~ – Removed and submitted as Waivers 1.v., 1.w.
- C. ~~Calculation of Medical/Disability Expense Deduction~~ – Removed and submitted as Waivers 1.t, 1.u.
- D. Discontinue Earned Income Disallowance (EID)
- E. ~~Proration of Assistance for Mixed-Eligibility Households~~
- F. ~~Voucher Set-Aside Program~~ – Amended Title: Waiver of Waitlist Requirements
- G. Strategic Waitlists

Attachment: MTW Activities Hardship Policy

**PENDING APPROVAL**

**H. Homeownership Program**

Full description:

HAWC currently operates a traditional Homeownership Voucher Program which has six participants. Analysis of this program has shown that the program is expensive, has limitations that make it burdensome for both staff and households, and does not appear to create long-term self-sufficiency.

HAWC is proposing a locally designed homeownership program. HAWC will phase out the current homeownership voucher program in favor of an alternative program that supports homeownership based on local best practices. Aspects of the program include:

Participation will be limited to households who are already voucher participants or public housing residents at the time of homeownership program enrollment. HAWC will establish eligibility at enrollment but will not recertify families before closing. Eligibility will be limited to households earning 80% AMI or less at time of application.

HAWC will work closely with community partners who provide homeownership education and additional resources to clients. HAWC will partner with Oregon certified Homeownership Centers in Washington County, who also can help buyers access down payment assistance grants and the OHCS Flex Lending program. The Homeownership Centers offer and require homebuyer education courses and can connect buyers to appropriate lenders in our community. Homebuyers will be able to combine resources from multiple agencies to establish a substantial down payment.

In alignment with the HCV “shopping” period, households enrolled in the program will have 120 days of assistance to ascertain eligibility for downpayment assistance and complete their purchase. HAWC will extend the timeline an additional 60 days, but will not extend initial eligibility past the 180-day maximum. Households are welcome to engage in homeownership education offered through various

community partners at any time before enrollment in the homeownership down payment assistance program.

HAWC is planning to engage our community and service partners to ensure that its using a downpayment assistance calculation that will efficiently bridge the gap for low-income homebuyers. The downpayment assistance will be calculated as the Market Payment Standard multiplied by 24 months.

The down payment assistance will be funded and provided by HAWC alone and will not include a repayment agreement. Households may be able to pair this assistance with other programs offered by the state or local partners. HAWC will consult with internal leadership, our advisory committees, local partners and impacted residents to determine a final amount that is both cost neutral and effective in helping individuals purchase their first home. The downpayment assistance is in lieu of the monthly subsidy. Once the household completes the purchase transaction, they are no longer participants in HAWC's programs.

HAWC is proposing a locally designed homeownership program. HAWC will phase out the current homeownership voucher program in favor of an alternative program that supports homeownership based on local best practices. Aspects of the program include:

Statute, Regulation or Operations Notice to be waived:

982.627(a)(1) – Waive to enable HAWC to admit both Section 8 Housing Choice Voucher households and public housing households

982.643(a)(1) – Waive to enable HAWC to admit both Section 8 Housing Choice Voucher households and public housing households

982.643(b) – Waive to enable HAWC to create a simplified flat downpayment grant amount, uncoupled from payment standards and total tenant payment calculations.

982.643(f) – Waive to enable HAWC to implement the downpayment assistance grant program.

MTW Statutory Objective: Self-sufficiency

Population groups and household types impacted by this activity: All

Cost Implications: Cost neutral

Implementation timeline: Upon approval, HAWC will end enrollment of new households into the homeownership voucher program. Households currently enrolled in the homeownership voucher program will be allowed to continue the original program through the end of their participation. HAWC will implement the alternative homeownership program in FY 2024-25, pending HUD approval.

Impact Analysis

1. Agency finances – The program will be set up to be neutral in impact to agency finances.
2. Affordability of housing costs – No projected impact.
3. Agency waitlist – No projected impact.
4. Termination rate – No projected impact.
5. Occupancy / Utilization – No projected impact.
6. MTW Statutory Goals – Encourage self-sufficiency.
7. Statutory Requirements – No projected impact.
8. Hardship requests – No projected impact.



9. Protected classes / Disparate impact – No projected impact.
Hardship Policy: See the attached MTW hardship policy.
Comments received + Agency response: HAWC received multiple comments in full support of revising the homeownership program to increase access and strategically move households toward self-sufficiency.

**PREVIOUSLY SUBMITTED**

**A. Income Verification**

<p>Full description</p> <p>Originally approved in the FY2022 PHA Plan. No new waiver requested.</p> <p>HAWC has implemented a waiver to the verification hierarchy found in PIH Notice 2018-18, “Administrative Guidance for Effective and Mandated Use of the Enterprise Income Verification (EIV) System”. HAWC has implemented this waiver for all current households (excludes income verification at new admission).</p> <p>HAWC will continue to use EIV and other Upfront Income Verification (UIV) tools as the first, preferred verification technique. Use of EIV is mandatory. The next level will be tenant-provided documents (including pay stubs) and tenant self-certification. The lowest ranking verification techniques will be third-party verification (written or oral).</p> <p>This waiver helps reduce cost and streamline processes in verifying income during the reexamination process. In HAWC’s experience, tenant-provided documents and tenant self-certification has been an efficient method of verifying income, when partnered with EIV and UIV.</p>
Based on the FY goals listed in the activity’s previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: Upon approval, HAWC implemented the waiver in FY2022. The waiver has helped to streamline processes in verifying income during the reexamination process.
Has there been a change in how the waiver is being implemented from when it was originally approved? No
Statute, Regulation or Operations Notice to be waived: Notice PIH 2018-18
MTW Statutory Objective: Reduce cost and achieve greater cost effectiveness in federal expenditures
Population groups and household types impacted by this activity: All
Cost Implications: HAWC anticipates a modest savings in staff time with this activity, but we do not anticipate staffing reductions. This activity will be relatively cost neutral.
Implementation timeline: HAWC implemented after receiving HUD approval on January 25, 2023.
<p>Impact Analysis:</p> <ol style="list-style-type: none"> <li>1. Agency finances - HAWC anticipates a modest savings in staff time with this activity, but we do not anticipate staffing reductions. This activity will be relatively cost neutral.</li> <li>2. Affordability of housing costs – No projected impact.</li> <li>3. Agency waitlist – No projected impact.</li> <li>4. Termination rate – No projected impact.</li> </ol>

5. Occupancy / Utilization – No projected impact.
6. MTW Statutory Goals - This activity is projected to increase staff efficiency by reducing reliance on third-party oral or written income verifications.
7. Statutory Requirements – No projected impact.
8. Hardship requests – No projected impact.
9. Protected classes / Disparate impact – No project impact.

Hardship Policy: This activity will primarily result in administrative efficiency and will not require a specific hardship policy. However, households will retain the existing rights to contest income findings. If the family disputes the accuracy of the data, the PHA will independently verify and give the family an opportunity to contest findings through the informal review/hearing process of the PHA. These policies are established in Chapters 7 of the HCV Program Administrative Plan and the Public Housing ACOP.

Comments received + Agency response: No comments received.

### **B. Calculation of Asset Income**

**Removed and submitted as Waivers 1.v., 1.w.**

### **C. Calculation of Medical/Disability Expense Deduction**

**Removed and submitted as Waivers 1.t., 1.u.**

### **D. Discontinue Earned Income Disallowance (EID)**

Full description

Originally approved in the FY2022 PHA Plan. No new waivers requested.

HUD has published proposed rules indicating that the Earned Income Disregard (EID) program will be discontinued. In anticipation, HAWC has ended our program and stopped enrolling new households into EID as of August 1, 2022. In accordance with the proposed HUD rules, HAWC allowed current EID participants to continue to receive the benefit until the end of their benefit timeframe, or on July 31, 2023 (whichever was sooner).

The EID program allowed some households to disregard income when calculating rent. However, the program was complicated to administer, with a number of different rules related to the calculation and the timeline. Because HUD has indicated the intention to end the program, HAWC sought a waiver to discontinue enrollment in advance, providing more time for phasing out the program and exploring other options for supporting households that are increasing their income.

Based on the FY goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: Upon approval, HAWC implemented the waiver in FY2022. HAWC no longer has any households enrolled in EID. This has simplified administration of our rent assistance programs.

Has there been a change in how the waiver is being implemented from when it was originally approved? No

Statute, Regulation or Operations Notice to be waived: Certain provisions of 24 CFR 960.255 and section 3(d) of the 1937 Act

MTW Statutory Objective: Reduce cost and achieve greater cost effectiveness in federal expenditures
Population groups and household types impacted by this activity: All
Cost Implications: Cost neutral
Implementation timeline: HAWC stopped enrolling new households into EID as of August 1, 2022, and allowed existing EID participants to continue to receive the benefit until the end of their benefit timeline or July 31, 2023.
<p>Impact Analysis</p> <ol style="list-style-type: none"> <li>1. Agency finances – Because current households will be allowed to finish out the majority of their planned benefit, HAWC expects minimal impact to agency finances.</li> <li>2. Affordability of housing costs – No projected impact.</li> <li>3. Agency waitlist – No projected impact.</li> <li>4. Termination rate – No projected impact.</li> <li>5. Occupancy / Utilization – No projected impact.</li> <li>6. MTW Statutory Goals – This activity is projected to increase staff efficiency by reducing the processes around administering the EID program.</li> <li>7. Statutory Requirements – No projected impact.</li> <li>8. Hardship requests – No projected impact.</li> <li>9. Protected classes / Disparate impact – No projected impact.</li> </ol>
Hardship Policy: Because current households will have until their benefit ends or July 31, 2023, HAWC does not anticipate any need for additional hardship policies.
Comments received + Agency response: No comments received.

**E. Proration of Assistance for Mixed-Eligibility Households  
Removed from Agency Specific Waiver Requests on 01/18/2023**

**F. Waiver of Waitlist Requirements**

<p>Full description</p> <p>. No new waiver requested.</p> <p>HAWC regularly partners with local service providers to create housing programs that provide supports to ensure stability and success for participating families. The partnerships frequently center around Project-Based Vouchers (PBVs). HAWC may set aside an agreed-upon number of tenant-based vouchers, when partnering with a service provider to prioritize Housing Choice Vouchers to serve a vulnerable target population.</p> <p>HAWC intends to work with a local school district to create a program aimed to house homeless students and their families. Washington County includes several school districts with notably high populations of homeless students, including Beaverton School District with the highest number of homeless students in the State of Oregon. The program would partner services provided by the school district’s McKinney Vento program with a tenant-based voucher for the family, and possibly additional supports provided by local services providers through our coordinated entry system. HAWC had planned to set aside 50 tenant-based vouchers in FY2022-2023 to serve these homeless</p>
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families and provide housing stability to families with children enrolled in the school district. Unfortunately, delays in HUD approval have slowed program implementation.
Based on the FY goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: HAWC received approval for this waiver in November 2023 and will work through implementation in 2024.
Has there been a change in how the waiver is being implemented from when it was originally approved? No.
Statute, Regulation or Operations Notice to be waived: Certain provisions of 24 CFR 982.207
MTW Statutory Objective: Housing choice
Population groups and household types impacted by this activity: Families with children
Cost Implications: Cost neutral
<p>Impact Analysis</p> <ol style="list-style-type: none"> <li>1. Agency finances – No projected impact.</li> <li>2. Affordability of housing costs – This activity will provide affordable housing for up to 50 homeless families with students in the partnering school system.</li> <li>3. Agency waitlist – No projected impact. The agency will continue to pull from the waitlist to increase utilization and maintain leasing numbers.</li> <li>4. Termination rate – No projected impact.</li> <li>5. Occupancy / Utilization – Because these vouchers are part of the regular ACC and may be paired with additional supports to find and maintain stable housing, this program may increase utilization in the voucher program.</li> <li>6. MTW Statutory Goals - This activity is projected to increase access to affordable housing for homeless families in our community.</li> <li>7. Statutory Requirements – No projected impact.</li> <li>8. Hardship requests – No projected impact.</li> <li>9. Protected classes / Disparate impact – No project impact.</li> </ol>
Hardship Policy: HAWC does not anticipate a negative impact on households through this activity. Therefore, no specific hardship policy is needed.
<p>Comments received + Agency response: Please see attached description of all public comments received and consideration/response to comments. One person asked a question specific to this activity:</p> <p><b>Has HAWC considered partnering with other service providers for the voucher set-aside program? For example, Portland Community College has a large number of homeless students.</b></p> <p>We are hopeful that the first voucher set-aside program with Beaverton School District will be successful, and will create a template for expanding the program to other service providers (such as Portland Community College). At this time we are only working with Beaverton School District.</p>

### G. Strategic Waitlists

Originally approved in our FY2022 PHA Plan. No new waiver requested.
HAWC's Project-Based Voucher (PBV) program serves a variety of household types, often in specific settings or with linked services that increase the likelihood of success and stability for the voucher holder. Similarly, the proposed Waiver of Waitlist Requirements (previously named Voucher Set-

Aside) program will provide assistance to targeted households, coupled with services and supports for those families.

To maximize efficiency for our PBV and Set-Aside programs, HAWC uses of strategic waitlist options. HAWC utilizes deliberate waitlist strategies for each PBV or Set-Aside program, to create a waitlist process that is the best fit for the individual scenarios. Strategic waitlist options include:

1) Referral-based placement: In situations where HAWC is working with a specific provider or a very targeted household type, HAWC may forego use of a waitlist and instead use a referral and selection process. HAWC will accept referrals from the specified partners and award those households the dedicated vouchers. Written documentation of the referral will be maintained by HAWC, but HAWC will not add the household to a waiting list, just to be immediately selected. This process will be modeled after the same procedure currently used for the existing VASH program.

For example, HAWC has dedicated PBV units for chronically homeless individuals, with supportive services linked to the assistance to ensure the household has the highest likelihood of housing stability. Our community has successfully established a Coordinated Entry System, through which people experiencing homelessness or at imminent risk of homelessness can find housing resources and be connected with qualified service providers. When HAWC has available PBV units dedicated to this specific population, it makes the most sense to accept referrals directly from the coordinated entry system using a network of referrals, instead of establishing a wait list with information that will quickly become obsolete.

When using a referral-based placement option, HAWC will establish an MOU with the referring partner, and will institute quality control metrics to ensure that households are being referred in an equitable manner.

2) Site-based waitlists: HAWC may allow individual PBV or Voucher Set-Aside programs to maintain their own site-based waiting lists with individual preferences. Site-based waitlists are often more practical to manage than the alternative of HAWC individually managing multiple different lists. In addition, it sometimes creates a better connection between the applicant and the property or program they've applied to.

HAWC is likely to use site-based waitlists when the project has the capacity to administer the waitlist for all units identified in the PBV HAP contract. The community provider and leasing agents must demonstrate the ability to adhere to the site-based waitlist policies and would be subject to contract monitoring to ensure the waitlist is being managed correctly by each contract. HAWC may still choose to administer select waitlists internally, per the current standard PBV waitlist processes.

When using a site-based waitlist option, HAWC will establish an MOU with the waitlist manager and will institute quality control metrics to ensure that households are being selected in an equitable manner.

3) Centralized PBV waitlist: For PBV units that are not dedicated to specific populations or services, HAWC may create a centralized waitlist similar to our centralized public housing waitlist. Households placed on this centralized waitlist will be eligible for the multiple PBV units and properties included in

the waitlist. This will maximize efficiencies in administering the waitlist and remove the necessity for households to register on each PBV waitlist that comes online.

As households are selected from the centralized waitlist, they will be given the option to refuse up to three available PBV units before they are removed from the list. The centralized waitlist will be administered internally, with the same quality control processes as our current public housing and tenant-based voucher waitlists.

For PBV units that are dedicated to specific populations or services, HAWC will continue to administer individualized waitlists or one of the other strategic waitlist options specified here.

4) Local waitlist preferences: HAWC may choose to implement specific preferences for individual PBV or Voucher Set-Aside waitlists, when there is not an appropriate partner to refer applicants or to administer a site- or program-based waitlist. Creating local preferences allows HAWC to ensure that the waitlist process is selecting applicants who are best served by the associated services and supports.

HAWC will ensure the preference is clear in the waitlist information at the time of application. Applicants will self-certify the preference and will be pulled based on preference time and date, then general time and date.

When any of these strategic waitlist processes are applied, the housing authority and/or the partner managing the process must comply with all applicable federal, state or local Fair Housing and civil rights laws and requirements. These laws and requirements are in place to promote equal housing choice for all prospective tenants regardless of race, color, religion, sex, sexual orientation, disability, familial status, or national origin. In cases where specific preferences are established, the housing authority and/or partner must apply criteria uniformly to all applicants in compliance with all Fair Housing and civil rights laws and requirements.

Based on the FY goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during implementation: HAWC received approval for this waiver in November 2023. There have been no changes in implementation.

Has there been a change in how the waiver is being implemented from when it was originally approved? No.

Statute, Regulation or Operations Notice to be waived: Certain provisions of 24 CFR 983.251(c) and 983.251(d)

MTW Statutory Objective: Reduce cost and achieve greater cost effectiveness in federal expenditures

Population groups and household types impacted by this activity: Vouchers

Cost Implications: Cost neutral

Implementation timeline: HAWC will begin to consider and implement new waitlist processes after July 1, 2022 (pending HUD approval).

Impact Analysis

1. Agency finances - HAWC anticipates a modest savings in staff time with this activity, but we do not anticipate staffing reductions. This activity will be relatively cost neutral.
2. Affordability of housing costs – No projected impact.

3. Agency waitlist – No projected impact.
4. Termination rate – No projected impact.
5. Occupancy / Utilization – HAWC anticipates a faster lease-up time for our Project-Based Voucher units and our Voucher Set-Aside program, when strategic waitlist options are used.
6. MTW Statutory Goals - This activity is projected to increase staff efficiency by reducing time spent managing multiple individualized waitlists.
7. Statutory Requirements – No projected impact.
8. Hardship requests – No projected impact.
9. Protected classes / Disparate impact – No project impact.

Hardship Policy – HAWC does not anticipate a negative impact on households through this activity. Therefore, no specific hardship policy is needed.

Comments received + Agency response: No comments received.

## MTW Activities: Hardship Policy

HAWC offers a hardship policy when households have mitigating circumstances and believe an MTW activity constitutes a financial or other hardship for the family. To qualify for a hardship, you must be following all program rules and regulations, and not owe HAWC money, or if you do owe money, be current in your repayment agreement. HAWC staff will remind households of the hardship policy during intake and regular reexamination meetings, and consider if a resident qualifies for a hardship exemption at the time of a potential termination of assistance that is due to an MTW activity.

Households must submit the request for the MTW Hardship Policy in writing. The process will be similar to the current process for requesting an interim review. If approved, the MTW activity will be suspended the next month following change reported by the 20<sup>th</sup> of the month. If the request is made after the 20<sup>th</sup>, the change will be effective the first of the following month.

### Households must identify which MTW Activity they are requesting to be suspended:

- Medical / Disability Expense Calculation
- Mixed-Eligibility Family Subsidy Reduction
- Triennial Reviews for Seniors/People with Disabilities
- Other: \_\_\_\_\_

*(Please note that the Tiered Rent Program includes a separate hardship policy.)*

### Households must identify the situation that qualifies them for hardship.

- Family has experienced a decrease in income of more than \$2,500 because of loss or reduction of income, death in the family, or loss or reduction of earnings or other assistance;
- Family has experienced an increase in expenses of more than \$2,500, such as a large medical expense

### Households must provide verification

- Attach any written documentation, such as pay stubs or receipts
- Additional explanation: \_\_\_\_\_

If your hardship request is approved, the MTW activity will be suspended and your rent calculation and process will be based on non-MTW regulations. **Please note that calculating rent based on non-MTW regulations may not always result in a rent reduction.** The hardship will be effective until the next annual update or review, up to 12 months.

If your hardship request is not approved, you will be able to appeal the decision for further review. If your appeal is denied, you will be able to request an informal hearing to review the determination of your monthly rent. Informal hearings are conducted by HAWC's Hearing Officer.



## Tiered Rent Program: Hardship Policy

Participating in the Tiered Rent Program should not threaten an individual or family’s housing stability. HAWC offers an affordability hardship to address childcare expenses, unexpected decreases in income, or exceptional household expenses, such as a large medical bill. HAWC also offers a Transition Discount for Large Families, for families with 5 or more dependents who would see a significant increase in rent when moving to the Tiered Rent Program.

### Affordability Hardship

This hardship application may be initiated by staff at enrollment or recertification, or may be requested by any household at any time. An approved rent adjustment may be enacted for 3 months, 6 months, or 12 months dependent on the circumstance. Renewal of hardship will require request from the household and approval from the agency.

If a household has...	Rent will be adjusted by...	Additional details...
Childcare expenses above \$2,500 per year	The household’s childcare expenses will be deducted from <b>current</b> annual income. This adjusted annual income will be used to determine tiered rent.	This hardship can be approved at the OS level. This hardship has 12-month duration, or until the household’s next regularly scheduled review, whichever is sooner.
A decrease in household income that drops the rent determination into a lower tier	The household’s annual income will be calculated using their <b>current</b> income, instead of their past income. Current income will be used to determine tiered rent.	This hardship can be approved at the OS level. This hardship has 12-month duration, or until the household’s next regularly scheduled review, whichever is sooner.
A significant unexpected event, such as a large medical expense, requiring temporary rent relief to avoid eviction	The expense will be deducted from annual income. This adjusted annual income will be used to determine tiered rent.  OR  To ensure housing stability, the household’s rent may be reduced as appropriate for a shorter amount of time.	<ul style="list-style-type: none"> <li>• This hardship will be reviewed by and require approval from a supervisor.</li> <li>• The household will be asked to provide documentation demonstrating the expense.</li> <li>• The hardship may last for 3 months, 6 months, or 12 months depending on remedy.</li> <li>• The household may request that the hardship be renewed.</li> </ul>

### How do I request a hardship?

To qualify for a hardship, you must be following all program rules and regulations, and not owe HAWC money, or if you do owe money, be current in your repayment agreement. HAWC staff will remind households of the hardship policy during intake and regular reexamination meetings, and will initiate

hardship requests if the household reports circumstances that qualify (such as childcare expenses or lower current income).

Households can also request hardships between triennial recertifications. This can be done by submitting a request in writing using the agency form, with review from a supervisor. The process will be similar to the current process for requesting an interim review. The MTW activity will be suspended the next month following change reported by the 20<sup>th</sup> of the month. If the request is made after the 20<sup>th</sup>, the change will be effective the first of the following month.

If your hardship request is approved, you are not required to report subsequent income increases during the period of your hardship. Once a hardship is approved, it will not end early.

If your hardship request is not approved, you will be able to appeal the decision for further review. If your appeal is denied, you will be able to request an informal hearing to review the determination of your monthly rent. Informal hearings are conducted by HAWC's Hearing Officer.

When your hardship expires, you can request a renewal if your circumstances have continued. There is no limit to the number of hardships that a household may receive. If you do not request a renewal or the renewal is denied, your rent will return to the tiered rent assigned at your most recent triennial review. Triennial review schedules will not change due to hardship requests, approvals or denials.

#### **Translation Services**

To request a translation of this document into another language (Spanish, Vietnamese, Arabic, Somali, Japanese, Micronesian, etc), please call 503-846-4814 or email [voucherteam@co.washington.or.us](mailto:voucherteam@co.washington.or.us).

## Tiered Rent Transition Discount for Larger Families

Because the Tiered Rent Program no longer includes dependent deductions, households with five or more dependents sometimes see a significant increase in rent when they transition to the tiered rent program. To help these families retain housing stability, HAWC offers a transition hardship policy that caps the rent increase due to program change.

- 1) Does the household have annual childcare expenses above \$2,500? If yes, apply the affordability hardship to their tiered rent calculation.
- 2) Does the household have a decrease in income? If yes, apply the affordability hardship to their tiered rent calculation.
- 3) After #1 and #2, does the household still have a projected increase in monthly rent of more than \$30? AND does the household have 5 or more dependents? If yes, apply the discount to cap their rent increase at \$30 (see example below).

Please note that this policy only applies to programmatic rent increases as a result of a change in the calculation. If a household has an increase in income that moves them to a different tier on the rent schedule, the corresponding rent increase will still apply.

The occupancy specialist will use the steps above to calculate the discount that caps the programmatic rent increase at \$30. If there is an increase in income that moves the household to a different tier on the rent schedule, the occupancy specialist will determine that rent and then apply the discount.

Similarly, if the household moves to a different unit, the occupancy specialist will use the tiered schedule to determine rent, and then apply the discount.

- The transition discount is applicable only through the tiered rent study, ending in 2028-2029.
- The policy has a 12-month duration. At the expiration, the family has the option to confirm that they still meet the criteria for the policy and request a renewal.
- At the first triennial review, the enrollment discount will continue to be applied if the household still has 5 or more dependents.
  - If the household has new childcare expenses about \$2,500 or has experienced a decrease in income, authorization to continue to apply the enrollment discount will be determined by a supervisor.

See the example household on the next page for more information.

## Tiered Rent Transition Discount for Larger Families

### Example household:

Household A is a single-adult household with 5 dependents, \$17,631 in annual income and no childcare expenses. The transition to the Tiered Rent Program would result in an increase of \$56 in monthly rent – from current rent of \$128 to future rent of \$184.

Tier 8: \$437  
 Less utility allowance: \$253  
 Year 1 Rent (no discount): \$184  
 Current rent: \$128  
 Difference: \$56

Tier	Income Minimum	Income Maximum	Monthly Rent
1	\$0	\$2,499	\$50
2	\$2,500	\$4,999	\$87
3	\$5,000	\$7,499	\$146
4	\$7,500	\$9,999	\$204
5	\$10,000	\$12,499	\$262
6	\$12,500	\$14,999	\$321
7	\$15,000	\$17,499	\$379
8	\$17,500	\$19,999	\$437
9	\$20,000	\$22,499	\$496
10	\$22,500	\$24,999	\$554
11	\$25,000	\$27,499	\$612
12	\$27,500	\$29,999	\$671
13	\$30,000	\$32,499	\$729
14	\$32,500	\$34,999	\$787
15	\$35,000	\$37,499	\$846

The occupancy specialist will verify criteria and apply a [discount of \\$26](#) to cap the rent increase at \$30 – from a current rent of \$128 to a future rent of \$158.

Tier 8: \$437  
 Less utility allowance: \$253  
[Less transition discount: \\$26](#)  
 Year 1 Rent: \$158  
 Current rent: \$128  
 Difference: \$30

In Year 3, Household A reports an increase in earned income to \$28,000. This moves the household to Tier 12 on the schedule. Because the household still has 5 or more dependents and no childcare expenses, the occupancy specialist calculates the household’s rent and applies the same transition discount.

Tier 12: \$671  
 Less utility allowance: \$253  
[Less transition discount: \\$26](#)  
 Year 3 Rent: \$392

## Tiered Rent Program – Bands

Tier	Income Minimum	Income Maximum	Monthly Rent
1	\$0	\$2,499	\$50
2	\$2,500	\$4,999	\$87
3	\$5,000	\$7,499	\$146
4	\$7,500	\$9,999	\$204
5	\$10,000	\$12,499	\$262
6	\$12,500	\$14,999	\$321
7	\$15,000	\$17,499	\$379
8	\$17,500	\$19,999	\$437
9	\$20,000	\$22,499	\$496
10	\$22,500	\$24,999	\$554
11	\$25,000	\$27,499	\$612
12	\$27,500	\$29,999	\$671
13	\$30,000	\$32,499	\$729
14	\$32,500	\$34,999	\$787
15	\$35,000	\$37,499	\$846
16	\$37,500	\$39,999	\$904
17	\$40,000	\$42,499	\$962
18	\$42,500	\$44,999	\$1,021
19	\$45,000	\$47,499	\$1,079
20	\$47,500	\$49,999	\$1,137
21	\$50,000	\$52,499	\$1,196
22	\$52,500	\$54,999	\$1,254
23	\$55,000	\$57,499	\$1,312
24	\$57,500	\$59,999	\$1,371
25	\$60,000	\$62,499	\$1,429
26	\$62,500	\$64,999	\$1,487
27	\$65,000	\$67,499	\$1,546
28	\$67,500	\$69,999	\$1,604
29	\$70,000	\$72,499	\$1,662
30	\$72,500	\$74,999	\$1,721
31	\$75,000	\$77,499	\$1,779
32	\$77,500	\$79,999	\$1,837
33	\$80,000	\$82,499	\$1,896

\*Please note: this is only a snapshot of the tiers, through Area Median Income. Tiers continue in increments of \$2,500 of income, with the rent calculated at 28% of the midpoint of each tier. Visual tables with higher tiers are available upon request.

## Payment Standards: Impact Analysis

This impact analysis applies to the following waivers:

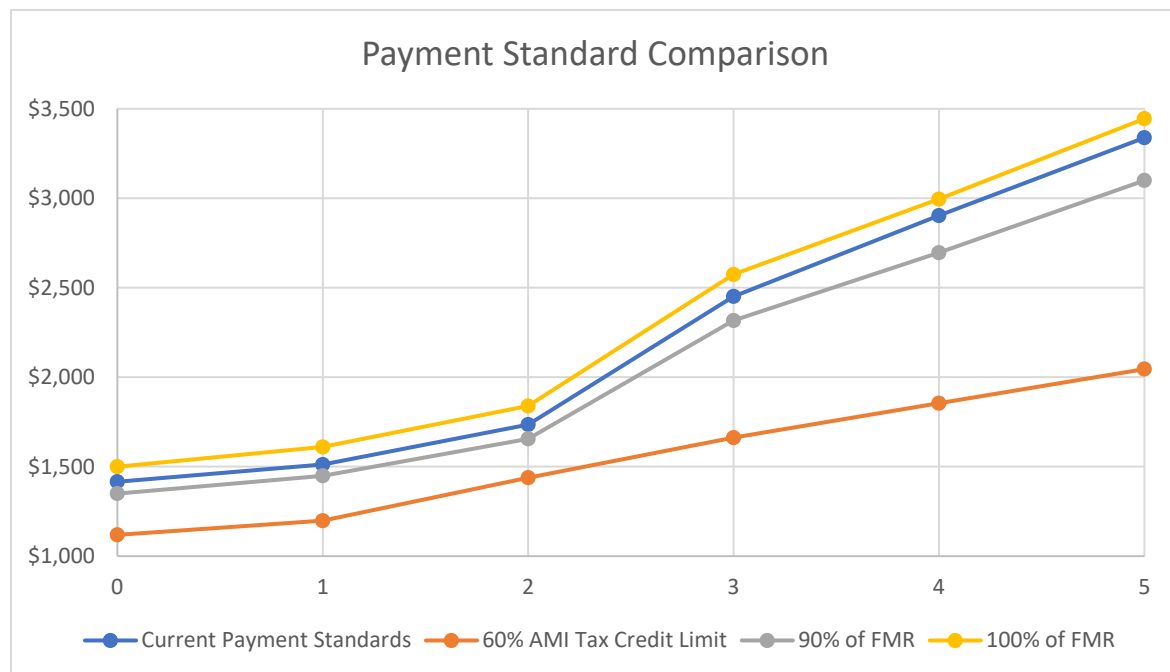
2.b. – Payment Standards – Fair Market Rents

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

HAWC anticipates this waiver to be cost neutral. Savings from the application of the Affordable Housing Payment Standard will likely supplement increases to the Market Rate Payment Standard.

### 2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay toward their housing costs)

No anticipated impact. Because 90% of FMR is consistently above the 60% AMI Tax Credit Limit, we do not anticipate the lower Affordable Housing Payment Standard limits will have an impact on affordability for families.



### 3. Impact on agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)

No anticipated impact.

### 4. Impact on agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)

No anticipated impact

### 5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program

No anticipated impact

**6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice**

This activity is projected to housing choice. Lowering the payment standard range for Affordable Housing will enable a higher payment standard for Market Rate housing.

**7. Impact on the agency's ability to meet the MTW statutory requirements**

No anticipated impact

**8. Impact on rate of hardship requests and the number granted/denied as a result of this activity**

No anticipated impact

**9. Impact on protected classes (and any associated disparate impact)**

No anticipated impact

## Public Comment

The 45-day public comment period ran February 17, 2023 through April 3, 2023. A draft of the PHA Plan and MTW Supplement was made available for review on the Housing Authority website.

Residents, participants and community partners were invited to a virtual public meeting on Thursday, March 30, 2023. Staff presented a review of the MTW waivers approved in 2022, as well as information about proposed waivers for 2023. Attendees did not have any comments or questions.

## Resident Advisory Board

The Resident Advisory Board meeting was held on Wednesday, March 29th. The Resident Advisory Board members did not have specific questions or comments, other than expressing support for the work done by staff.

## Public Hearing for Safe Harbor Waivers and Agency Specific Waivers

A meeting for community stakeholders and other members of the public was held on Thursday, March 30<sup>th</sup> and also served as the public hearing for Safe Harbor Waivers and Agency Specific Waivers. There were no comments or questions from attendees.

## Public Hearing

The Housing Authority Board of Directors held a public hearing on Tuesday, April 4<sup>th</sup>. Notice of Public Hearing was published in multiple news outlets February 20-28, 2023.

Comment: Appreciation in general for the work done in the community and for the support of the Board of Directors.