

PHA Name : Washington County (OR)

PHA Code : OR022

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

PHA Program Type: Combined

MTW Cohort Number: Stepped and Tiered Rent

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

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 (FY 2022-2023) we implemented our tiered rent study, as well as a triennial review schedule for seniors and people with disabilities and simplified aspects of the rent calculation. Changes like these create efficiencies for our staff and better understanding and transparency for the households we serve. In FY 2023-24, we expanded on these approaches, proposing a simplified utility allowance schedule and a locally designed payment standard, both to consider the conditions of our local community and respond to housing stability needs.

In FY 2024-2025 we are focusing on fully implementing approved waivers, analysis of activities to determine impact on households, and preparation for upcoming activities. We are not requesting any additional waivers in FY 2024-2025.

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).

1. Tenant Rent Policies	
a. Tiered Rent (PH)	Currently Implementing
b. Tiered Rent (HCV)	Currently Implementing
i. Alternative Utility Allowance (PH)	Currently Implementing
j. Alternative Utility Allowance (HCV)	Currently Implementing
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
2. Payment Standards and Rent Reasonableness	
b. Payment Standards- Fair Market Rents (HCV)	Currently Implementing
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Currently Implementing
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
4. Landlord Leasing Incentives	
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Currently Implementing
c. Third-Party Requirement (HCV)	Currently Implementing
d. Alternative Inspection Schedule (HCV)	Plan to Implement in the Submission Year
6. Short-Term Assistance	
7. Term-Limited Assistance	
8. Increase Elderly Age (PH & HCV)	
9. Project-Based Voucher Program Flexibilities	
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
10. Family Self-Sufficiency Program with MTW Flexibility	
11. MTW Self-Sufficiency Program	
12. Work Requirement	
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
14. Moving on Policy	
a. Waive Initial HQS Inspection Requirement (HCV)	Currently Implementing
15. Acquisition without Prior HUD Approval (PH)	
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	

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

1.a. - Tiered Rent (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. No new waiver requested.
As part of our MTW designation, HAWC has implemented 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 only applies to a small portion of our households. The initial program is for six years and began enrolling households in FY 2022-2023. The program enrolled 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 are selected randomly for participation by the research firm's website. Of the households that are eligible, approximately half are selected for the Tiered Rent Program and half are selected as comparison households. Comparison households will continue to have their rents calculated using the standard calculation.

Under the Tiered Rent Program, households 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 and approved. 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 households with a recertification effective date of April 2024, 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.

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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. No new waiver requested.

As part of our MTW designation, HAWC has implemented 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 only applies to a small portion of our households. The initial program is for six years and began enrolling households in FY 2022-2023. The program enrolled 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 are selected randomly for participation by the research firm's website. Of the households that are eligible, approximately half are selected for the Tiered Rent Program and half are selected as comparison households. Comparison

households will continue to have their rents calculated using the standard calculation.

Under the Tiered Rent Program, households 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 and approved. 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 households with a recertification effective date of April 2024, 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.

No 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

Originally approved in the FY2023 PHA Plan. No new waiver requested.

HAWC has created an alternative utility allowance schedule for public housing and voucher units. The traditional 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 created a utility allowance schedule that considers bedroom size, and only whether the household pays heat/electricity and water/sewer/garbage.

0BR 1BR 2BR 3BR 4BR 5BR 6BR

1. Tenant Pays Water/Sewer
(or tenant pays all utilities) \$ \$ \$ \$ \$ \$

2. Tenant Pays Heat & Electric
(Landlord pays water/sewer) \$ \$ \$ \$ \$ \$

3. Tenant Pays No Utilities
(Landlord pays all utilities) \$ \$ \$ \$ \$ \$

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

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 of this waiver in June 2023 and implemented the simplified utility allowance effective October 1, 2023.

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 created a simplified utility allowance schedule that considers 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

Originally approved in the FY2023 PHA Plan. No new waiver requested.

HAWC has created an alternative utility allowance schedule for public housing and voucher units. The traditional 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 created a utility allowance schedule that considers bedroom size, and only whether the household pays heat/electricity and water/sewer/garbage.

0BR 1BR 2BR 3BR 4BR 5BR 6BR

1. Tenant Pays Water/Sewer
(or tenant pays all utilities) \$ \$ \$ \$ \$ \$

2. Tenant Pays Heat & Electric
(Landlord pays water/sewer) \$ \$ \$ \$ \$ \$

3. Tenant Pays No Utilities
(Landlord pays all utilities) \$ \$ \$ \$ \$ \$

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

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 of this waiver in June 2023 and implemented the simplified utility allowance effective October 1, 2023.

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 created a simplified utility allowance schedule that considers 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. No new waiver requested.

As described in 1.a. and 1.b., the Tiered Rent Program utilizes a rent schedule based on \$2,500 bands of the household's gross income. Households selected for this program have their rent calculated using gross income from the prior twelve months (except for new admissions, who have their rent calculated using current gross income). As a part of the policy, deductions and allowances are not 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 households with a recertification effective date of April 2024, 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

<p>How many hardship requests have been received associated with this activity in the past year?</p> <p>No hardship were requested in the most recent fiscal year.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Does the MTW activity require an impact analysis?</p> <p>Provided Already</p>
<p>Which deduction(s) will be eliminated, modified, or added?</p> <p>Dependent allowance; Unreimbursed childcare costs; Other</p>
<p>Other (please explain)</p> <p>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.</p>

<p>1.s. - Elimination of Deduction(s) (HCV)</p>
<p>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</p> <p>Originally approved in the FY2022 PHA Plan. No new waiver requested.</p> <p>As described in 1.a. and 1.b., the Tiered Rent Program utilizes a rent schedule based on \$2,500 bands of the household's gross income. Households selected for this program have their rent calculated using gross income from the prior twelve months (except for new admissions, who have their rent calculated using current gross income). As a part of the policy, deductions and allowances are not included in the calculation of gross income.</p> <p>Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:</p> <ul style="list-style-type: none"> 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.
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Decreased revenue; Increased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>New admissions and currently assisted households</p>

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 households with a recertification effective date of April 2024, 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?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

Yes

Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis 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)

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. No new waiver requested.

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

HAWC uses a simplified table (below) to calculate allowances related to a household's medical or disability expenses. We no longer use a varying medical or disability expense threshold for households. In essence, we 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 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 applies 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.

Increased revenue; Decreased expenditures

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

The MTW activity applies 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 in March 2023 and implemented in the following months. The waiver has simplified the medical calculation for households, improving administration as well as participant understanding.

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?
Yes
This document is attached.
Does the impact analysis apply to more than this MTW activity?
Yes
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. No new waiver requested.
HAWC is using MTW flexibility to simplify the calculation of the medical or disability expense deduction, the process of verifying expenses, and how those expenses impact a household's rent.
HAWC uses a simplified table (below) to calculate allowances related to a household's medical or disability expenses. We no longer use a varying medical or disability expense threshold for households. In essence, we 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 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 applies 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.

Increased revenue; Decreased expenditures

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

The MTW activity applies 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 in March 2023 and implemented in the following months. The waiver has simplified the medical calculation for households, improving administration as well as participant understanding.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Provided Already

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. No new waiver requested.

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 reporting assets in 2022, only 21 households (or 1%) had assets of \$100,000 or more. The total impact of those assets represented 65% of the difference in final rent calculations across the agency. Continuing to include

assets of \$100,000 or more ensured that households with significant asset income use a portion of that income toward their rent.

This activity is applied 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 and approved.)

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 in March 2023 and implemented in the following months. The waiver has been helpful in streamlining the asset verification process.

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?

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. No new waiver requested.

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 reporting assets in 2022, only 21 households (or 1%) had assets of \$100,000 or more. The total impact of those assets represented 65% of the difference in final rent calculations across the agency. Continuing to include

assets of \$100,000 or more ensured that households with significant asset income use a portion of that income toward their rent.

This activity is applied 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 and approved.)

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 in March 2023 and implemented in the following months. The waiver has been helpful in streamlining the asset verification process.

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

Originally approved in the FY2023 PHA Plan. No new waiver requested.

To best meet the local needs of our community, the Housing Authority of Washington has adopted and implemented local policies to establish payment standards based on Fair Market Rents (FMR).

In FY2023-24, HAWC created and applied 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 started at our current rate so no household has 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

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 of this waiver in June 2023 and implemented the updated payment standards effective October 1, 2023.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

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. No new waiver requested.

HAWC has eliminated the requirement for a third party to conduct rent reasonableness on units our agency owns or controls, assisted with project-based vouchers. HAWC previously engaged a third-party contractor to conduct rent reasonableness in these cases, and it was time consuming and costly. Conducting rent reasonableness calculations internally streamlines processes and creates cost effectiveness. HAWC utilizes 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.

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. No new waiver requested.

HAWC is utilizing 3.a. and 3.b 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 utilizes a rent schedule based on \$2,500 bands of the household's gross income. Households who are selected for this program 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 do 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 has implemented 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 were 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 is 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 and approved 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.

Tiered Rent Program: HAWC began enrolling eligible households in the Tiered Rent Program in January 2023. Enrollment will continue through households with a recertification effective date of April 2024.

Triennial Reviews: HAWC received approval for this waiver in June 2022 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.

Certain provisions of sections 8(o)(5) of the 1937 Act and 24 CFR 982.516(a)(1) and 982.516(c)(2).

3.a.ii. and 3.b.ii.

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?

Yes

This document is attached.

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

Yes

Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)

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

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 Rent: 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. No new waiver requested.

HAWC is utilizing 3.a. and 3.b 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 utilizes a rent schedule based on \$2,500 bands of the household's gross income. Households who are selected for this program 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 do 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 has implemented 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 were 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 is 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 and approved 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.

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 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.

Tiered Rent Program: HAWC began enrolling eligible households in the Tiered Rent Program in January 2023. Enrollment will continue through households with a recertification effective date of April 2024.

Triennial Reviews: HAWC received approval for this waiver in June 2022 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.

Certain provisions of sections 8(o)(5) of the 1937 Act and 24 CFR 982.516(a)(1) and 982.516(c)(2).

3.a.ii. and 3.b.ii.

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 Rent: 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. No new waiver requested.

HAWC has implemented the option to allow pre-qualifying unit inspections, within 90 days of the participant occupying the unit. Allowing pre-qualifying inspections streamlines the process and allows 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.

HAWC received approval for this waiver in June 2022 and utilizes pre-qualifying inspections for project-based units only, specifically for newly built or rehabilitated units. 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. No new waiver requested.

HAWC has eliminated 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 previously engaged a third-party contractor to conduct HQS inspections in these cases, and it was time consuming and costly. Using HAWC staff to conduct these HQS inspections streamlines processes and creates 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. No new waiver requested.

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 may self-certify adherence to HQS inspection standards. This policy allows 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 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 employs 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 also tracks 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.

HAWC received approval of this waiver in June 2022. Implementation is currently pending the full roll out of NSPIRE protocols to ensure cohesion.

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. No new waiver requested.

HAWC has increased 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 15% 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. No new waiver requested.

HAWC has increased 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. No new waivers requested.

HAWC has eliminated 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. No new waiver requested.

HAWC has changed 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.

HAWC received approval for this waiver in March 2023. Activity was implemented in 2024.

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. No new waiver requested.

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

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

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</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>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p>No</p>

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

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

Yes

Title	Has there been a change in how the waiver is being implemented from when it was originally approved?	Please provide a description of what has changed.	Please provide a description of the final outcomes and lessons learned from implementing this Activity at your PHA.	If the MTW Agency was previously required to prepare an impact analysis, was a final impact analysis prepared at the time of discontinuation?
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E.2

Homeownership Program	No			
Waiver of Waitlist Requirements	No			
Discontinue Earned Income Disallowance (EID)	No			
A. Income Verification D. Discontinue Earned Income Disallowance (EID) F. Amended Title: Waiver of Waitlist Requirements G. Strategic Waitlists H. Homeownership Program	No			
Strategic Waitlists	No			
Income Verification	No			
A. Income Verification D. Discontinue Earned Income Disallowance (EID) F. Waiver of Waitlist Requirements G. Strategic Waitlists H. Homeownership Program	No			
D. Discontinue Earned Income Disallowance (EID)	No			
H. Homeownership Program	No			
A. Income Verification	No			
G. Strategic Waitlists	No			
F. Waiver of Waitlist Requirements	No			

F.	Public Housing Operating Subsidy Grant Reporting.
F.1	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	\$1,013,195	\$1,013,195	\$0	2031-09-30
2024	\$413,032	\$238,167	\$174,865	2032-09-30

G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. 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.	
	Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
	80%-50% Area Median Income	0
	49%-30% Area Median Income	0
	Below 30% Area Median Income	0
	Total Local, Non-Traditional Households	0

*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.

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

G.3	Substantially the Same (STS) – Local, Non-Traditional.
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	0 # 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.	0 # 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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G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
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	0
2 Person	0
3 Person	0
4 Person	0
5 Person	0
6+ Person	0
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.	

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.	MDRC Contact: Nina Castells; Nina.Castells@mdrc.org	HAWC anticipates evaluation to run July 1, 2022 through June 30, 2028.	None

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

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

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

Housing Authority of Washington County

(OR 022)

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).

Kathryn Harrington
NAME OF AUTHORIZED OFFICIAL

Chair
TITLE

[Signature]
SIGNATURE

05/14/2024
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.**

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 20th of the month. If the request is made after the 20th, 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 current 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 current 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	<p>The expense will be deducted from annual income. This adjusted annual income will be used to determine tiered rent.</p> <p>OR</p> <p>To ensure housing stability, the household’s rent may be reduced as appropriate for a shorter amount of time.</p>	<ul style="list-style-type: none"> • This hardship will be reviewed by and require approval from a supervisor. • The household will be asked to provide documentation demonstrating the expense. • The hardship may last for 3 months, 6 months, or 12 months depending on remedy. • The household may request that the hardship be renewed.

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 20th of the month. If the request is made after the 20th, 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.

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: Impact Analysis (FY 2022)

This impact analysis applies to the following waivers:

- a. 1.a., 1.b. + Safe Harbor – Tiered Rents (approved in FY 2022)
- b. 1.r., 1.s. – Elimination of Deductions (approved in FY 2022)
- c. 3.a., 3.b. + Safe Harbor – Reexamination Schedule (approved in FY 2022)

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 approximately \$39,000 in decreased public housing rent and/or increased voucher HAP costs per year under the Tiered Rent Program.

Annual Agency Impact

Public Housing Rents (decreased income)	Housing Assistance Payments (increased expense)	Total Agency Impact
-\$5,000	\$34,000	\$39,000

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)

The following analysis uses the current information of households that would be considered eligible for the program. We have approximately 600 households that would likely be eligible – half will be randomly selected and half will be assigned to the control group. 70% of eligible households will see a rent decrease or no change if they are selected for the Tiered Rent Program.

This impact analysis takes into account established hardship policies to mitigate the impact of the policy for families who have childcare expenses of \$2,500 and/or families who have five or more dependents. Because of the policies removal of deductions, these households saw significant rent increases when moving to the Tiered Rent Program. HAWC has established hardship policies to moderate these rent increases.

The average rent change across all eligible households is a **decrease** in rent of \$10.81. For those households that see a rent increase, the average increase is \$24. The largest projected increase is \$61 in monthly rent.

	Households	Percentage
Rent Decrease	311	52%
No change*	108	18%
Rent Increase	181	30%
Rent Increase Increments		
\$5-\$10	29	5%
\$11-\$25	65	11%
\$26-\$50	79	13%
\$51 or more	8	1%

	Amer Ind/ Alaska Nat	Asian	Black/ African Amer	Hispanic	Native HI/ Pac Island	White
No. of Households	6	15	136	135	14	429
Avg Rent Change	\$18.00	(\$27.33)	(\$9.32)	(\$6.40)	(\$27.21)	(\$10.57)
Rent Decrease	-	10	67	62	9	225
No change	-	2	20	25	2	84
Rent Increase	6	3	49	48	3	120
Rent Increase Increments						
\$5-\$10	2	2	5	11	1	19
\$11-\$25	3	1	18	13	1	42
\$26-\$50	1	-	26	20	-	52
\$51 or more	-	-	-	4	1	7

Table Notes:

- Due to rounding calculations, “No Change” is defined as a projected rent increase or decrease of less than \$5.
- Race and ethnicity terms are per the HUD required reporting fields.
- Households counted in the “Hispanic” column may also be counted in other race/ethnicity columns.
- Because of statistically small counts of American Indian/Alaskan Native, Asian, and Native Hawaiian/Pacific Islander households, the average rent impact numbers are easily skewed by outlying households.

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

HAWC anticipates a positive impact on the statutory goals of cost effectiveness and self-sufficiency. Triennial reviews and the elimination of deductions are expected to result in administrative efficiencies and reduction in staff time for annual reviews.

Because households do not have to report income increases between triennial recertifications, HAWC anticipates increased incentive (or decreased disincentive) for families to increase earnings and move

toward self-sufficiency. Households will be able to use increase income in the time between triennial reviews to build financial and housing stability.

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

HAWC anticipates that a higher number of households in the Tiered Rent Program will request a hardship than under the current policy. Families who have unreimbursed childcare expenses and those that have a significant number of dependents will see a higher impact through the Tiered Rent Program, due to the loss of deductions.

HAWC has established a hardship policy for households with annual childcare expenses of \$2,500 or more, and for those with 5 or more dependents to mitigate the impacts of the change to the Tiered Rent Program. Of the 600 anticipated households eligible for the Tiered Rent Program, approximately 40 households (about 7%) would qualify for these hardships.

HAWC has also established a hardship policy for households whose current income is lower than their retrospective income and for those who have an unexpected loss in income or significant unexpected expense. HAWC will track hardship requests, approvals or denials, and the impact on staff time.

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

As previously stated, this program has the largest impact for families with unreimbursed childcare expenses and/or a significant number of dependents. Among eligible families, our households with five or more dependents more often have heads of household who are Black/African American or Hispanic. HAWC recognized disparate impact by race/ethnicity in the Tiered Rent Program and has taken significant steps to mitigate that impact.

The original Tiered Rent Program as described in the Final MTW Operations Notice designed a tiered rent structure based on 30% of income at the middle of each tier. Because the calculation no longer included deductions for dependents or unreimbursed childcare expenses, we saw significant rent increases for many of our families. After reviewing the analysis, HUD agreed to change the rent structure to tiers based on 28% of income.

The change to 28% improved impacts for our households and decreased the number of families who would see a rent increase, but HAWC still saw disparate rent increases for families with 5 or more children, who were more often led by heads of household who are Black/African American or Hispanic. Although it is not a part of the policy as defined by HUD, HAWC is implementing an agency-specific hardship policy for families with 5 or more dependents. This hardship policy will lower rent increases for large families and significantly reduce the disparate impact between households by race/ethnicity.

The table on the next page shows the different impacts as HAWC has developed policy. Hardship policies have reduced the disparate impact between households by race/ethnicity, but on average our Black/African American and Hispanic households see a smaller rent reduction than the total population.

Original Policy

Rents based on 30% of income

Rent Increases	72%
No change (\$4 to -\$4)	16%
Rent Decreases	12%

Highest Increase: \$415

	All Households	Amer Ind/ AK Native*	Asian*	Black/ AA	Hispanic	Native HI/ Pac Isl*	White
Avg Impact	\$29.75	\$48.67	\$16.60	\$36.63	\$32.45	\$23.07	\$26.11
Average Impact for Households with 5+ dependents: \$70.47							

Revised Policy

Rents based on 28% of income

Rent Increases	30%
No change (\$4 to -\$4)	18%
Rent Decreases	52%

Highest Increase: \$98

	All Households	Amer Ind/ AK Native*	Asian*	Black/ AA	Hispanic	Native HI/ Pac Isl*	White
Avg Impact	(\$9.56)	\$18.00	(\$27.33)	(\$5.87)	(\$6.57)	(\$27.21)	(\$11.33)
Avg Impact for Households with 5+ dependents: \$29.47							

HAWC Hardship Policy

Rents based on 28% of income
 \$30 rent increase cap for large households

Rent Increases	30%
No change (\$4 to -\$4)	18%
Rent Decreases	52%

Highest Increase: \$61

	All Households	Amer Ind/ AK Native*	Asian*	Black/ AA	Hispanic	Native HI/ Pac Isl*	White
Avg Impact	(\$10.81)	\$18.00	(\$27.33)	(\$9.32)	(\$6.40)	(\$27.21)	(\$10.57)
Avg Impact for Households with 5+ dependents: \$12.53							

Table Notes:

- Less than 20 eligible households in the American Indian/Alaskan Native, Asian, and Native Hawaiian/Pacific Islander categories. Outliers may skew averages.
- Numbers in parentheses represent decreases in anticipated monthly rent.

Medical/Disability Expense Deduction: Impact Analysis (FY 2022)

This impact analysis applies to the following waivers:

1.t, 1.u. – Standard Deductions (approved in FY 2022)

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 savings of approximately \$11,000 annually in reduced HAP costs or increased public housing rent. Additionally, HAWC anticipates a savings in staff time with this activity, but we do not anticipate staffing reductions.

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)

Of the 492 households who currently report medical/disability expenses, the majority will see no change or very little change in their monthly rent due to this activity.

492 Households with reported medical/disability expenses

Rent Increase			No change	Rent Decrease		
\$21+	\$11-\$20	\$1-\$10		\$1-\$10	\$11-\$20	\$21+
6	51	172	177	52	29	5

The largest increase in monthly rent is \$28. The largest decrease in monthly rent is \$44.

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 increase staff efficiency by reducing the processes around gathering information for medical and disability expenses, calculating the deduction, and reducing medical and disability expense reporting to once every 12 months.

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

Payment Standards: Impact Analysis (FY2023)

This impact analysis applies to the following waivers:

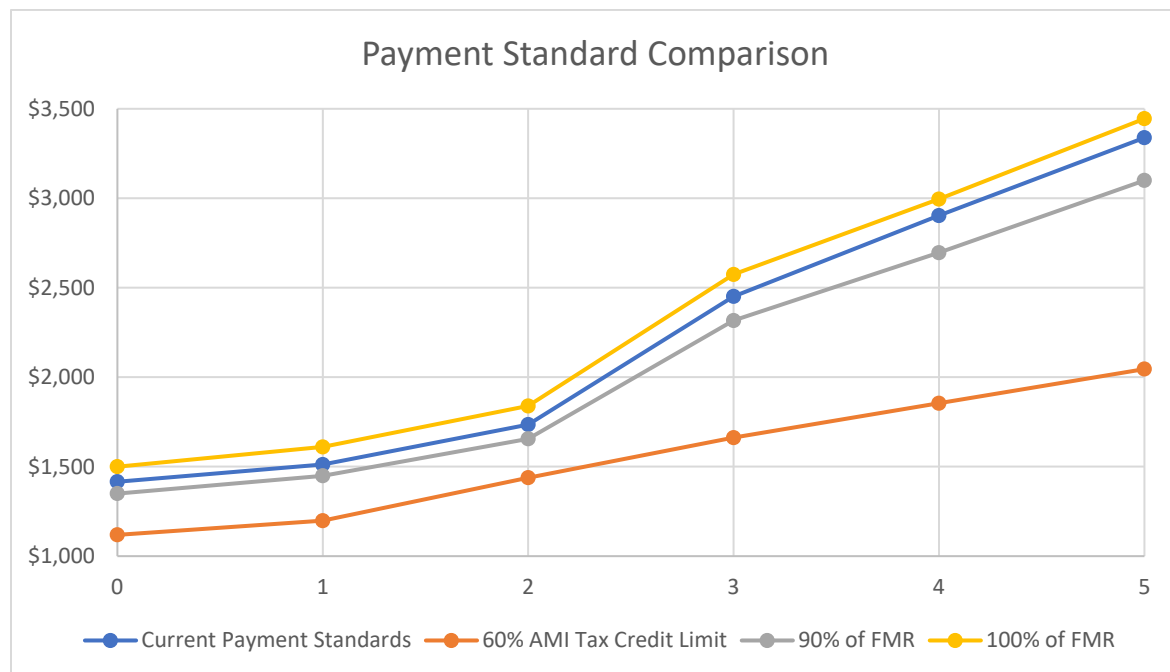
2.b. – Payment Standards – Fair Market Rents

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

Triennial Reexamination Schedule: Impact Analysis (FY 2022)

This impact analysis applies to the following waivers:

3.a., 3.b. – Reexamination Schedule (approved in FY 2022)

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

Although HAWC anticipates time savings in this activity, we do not anticipate an impact on agency finances.

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

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

No anticipated impact. Although fewer families may transition from assistance in the time between triennial reviews vs annual reviews, this population tends to be relatively stable in their need for ongoing assistance and HAWC projects that any impact would be minimal.

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

HAWC anticipates an increase in administrative efficiency and cost effectiveness through this activity. After review of the time spent on a typical annual recertification, HAWC projects approximately 900 hours in time savings per year, due to shifting these households to a triennial recertification schedule.

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

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.

Public Comment

The 45-day public comment period ran March 15, 2024 through April 29, 2024. A draft of the PHA Plan and MTW Supplement was made available for review on the Housing Authority website. Notice of the public comment period was published in The Oregonian on April 19, 2024.

Resident Advisory Board

The Resident Advisory Board meeting was held on Monday, March 25th. 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

The Housing Authority of Washington County is not requesting any Safe Harbor Waivers or Agency Specific Waivers in FY2024.

Housing Advisory Committee

The Housing Advisory Committee met and reviewed the PHA Plan and MTW Supplement on Thursday, April 25th.

Question: What is the benefit of the agency having MTW authority?

Response: The MTW program provides the Housing Authority of Washington County with a unique opportunity to design and test innovative, locally designed housing and self-sufficiency strategies for serving low-income families. MTW agencies have greater flexibility to administer their public housing and Housing Choice Voucher programs with policies that can address local needs and that allow the housing authority to utilize restricted funds in creative ways.

Question: What happens to households currently participating in the Homeownership Voucher Program, when they reach the term limit?

Response: The Housing Authority does not retain any interest in the home or the loan; the voucher program simply provides assistance in paying the mortgage payment. When the participant reaches the time limit, they become responsible for paying their mortgage on their own. If they are unable to continue paying their mortgage, they're likely able to sell their home at a significant profit due to earnings in equity.

The Housing Advisory Committee unanimously voted to recommend the FY 2024-25 Annual PHA Plan and MTW Supplement for submission to, and approval by, the Housing Authority Board of Directors.

Public Hearing

The Housing Authority Board of Directors held a public hearing on Tuesday, May 7, 2024. Notice of Public Hearing was published in The Oregonian on April 19, 2024.