

VANCOUVER
HOUSING
AUTHORITY

MOVING TO WORK
ANNUAL PLAN
FISCAL YEAR 2010

AMENDED DECEMBER 14, 2009



VANCOUVER HOUSING AUTHORITY

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SECTION I

OVERVIEW OF VANCOUVER HOUSING AUTHORITY

MOVING TO WORK GOALS AND OBJECTIVES

The Vancouver Housing Authority (VHA) is located in Clark County, Washington. The VHA is the only housing authority in the county and serves the unincorporated areas and small cities through intergovernmental cooperation agreements. Clark County has been one of the fastest growing counties in the nation during the past decade. We have grown at a time when federal resources have diminished, resulting in long waiting lists for public housing and housing choice vouchers. The VHA's challenge is to serve an increasing population with limited resources. To that end, we strive to make efficient and effective use of federal housing programs and to look for other public and private resources that can be invested in meeting the goal of providing decent, affordable housing for everyone.

The VHA is one of about 30 housing authorities across the country participating in the U.S. Department of Housing and Urban Development (HUD) Moving to Work (MTW) demonstration program. Originally authorized under the Omnibus Consolidated Rescissions and Appropriations Act of 1996, the MTW program offers public housing authorities the opportunity to design and test innovative, locally-designed housing and self-sufficiency strategies. The program allows certain exceptions from federal rules governing the Public Housing and Section 8 Housing Choice Voucher (HCV) programs and in some cases offers flexibility in the funding of these programs.

Under the MTW program the VHA, working with other stakeholders, creates and adopts an annual plan that describes new strategies and policies that utilize authority granted the VHA under the MTW Agreement. This plan primarily focuses on the public housing and HCV housing programs as these are the VHA programs that fall under MTW. However this plan does contain a limited amount of information regarding VHA's non-MTW housing

stock and our plans regarding rehabilitation of certain properties and development of others.

MTW STATUTORY GOALS

New strategies and policies designed by the VHA, and other housing authorities in MTW, must meet at least one of the statutory goals of the demonstration program:

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

VHA MTW OBJECTIVES

VHA plans to continue to use authority under the MTW program to streamline and simplify required program eligibility processes and management requirements. These MTW initiatives will result in administrative cost savings without sacrificing program integrity. Generally these savings will allow for additional resources to be made available for a variety of self-sufficiency incentives and programs to be offered and even required of participants in the public housing and HCV programs. In addition, VHA will utilize MTW to create new housing programs and opportunities for very low-income persons not normally able to be served under conventional regulations.

VHA NEW AND ONGOING MTW ACTIVITIES

For 2010 VHA is proposing two new MTW activities designed to give incentives to families to become economically self-sufficient. The first will create a community service requirement in the HCV program in addition to the one required for public housing residents. By requiring work-able adults working less than 25 hours per week to engage in educational activities or services that will provide employment encouragement and opportunities, progress toward economic self-sufficiency can be achieved. The second activity will involve the transformation of a large public housing community into a learning campus. This transformation will coincide with a physical transformation of the community through a green retrofit.

Another proposed MTW activity for 2010 is designed to achieve reduced costs through elimination of unnecessary duplication of lease-up efforts by providing a waiting list preference that assures available units go to households not already receiving housing assistance.

VHA has a large number of MTW activities that will be ongoing in 2010. Activities designed to reduce the frequency of eligibility activity include alternate reexamination and inspection schedules and an interim policy. Activities that simplify or eliminate verifications include a simplified reexamination process, and the elimination of certain asset verification and of the medical deduction. Other activities that streamline the eligibility process include the elimination of flat rents and earned income disallowance in public housing.

Ongoing MTW activities that provide incentives toward economic self-sufficiency include a required renter education program that includes budgeting and financial training, policies that encourage participation in self-sufficiency programs, and financial enhancements to those self-sufficiency programs and the VHA community center.

MTW activities that provide more housing choice include modified project-based and homeownership programs within the HCV program, modification to the waiting list requirements, and a simplified utility allowance in the HCV program that provides for more informed choice for participants searching for a rental unit.

VHA ACTIVITIES OUTSIDE OF MTW

Beginning in 2009, but continuing into 2010 VHA has made a \$9.5 million reinvestment into our community with renovation to three VHA Workforce apartment complexes. By the time these rehab projects are completed in 2010 over 300 workers will have been involved. An additional \$5 million for rehab of another Workforce Housing community is planned for 2010.

Also continuing into 2010 is the ARRA funded replacement of plumbing and roofing at Van Vista Plaza, a 100 unit public housing senior high-rise. VHA has applied for funding under the Capital Fund Recovery Competition (CFRC) grant for an additional rehab project at Van Vista, funding to transform a 150 unit public housing property into a green community, and for a mixed finance project for 172 senior housing units.

VHA is planning several other new developments for the coming year, and anticipates that 2010 will be an active year both within and without the Moving to Work Demonstration, with a great many activities aiming toward creating jobs and community.

SECTION II

GENERAL HOUSING AUTHORITY

OPERATING INFORMATION

HOUSING STOCK INFORMATION

VHA has 575 units of public housing all of which are included in the Moving to Work Demonstration. This number includes 60 units of assisted living that previously were not always included in reports on the public housing inventory. Despite their current special use, these units remain in the public housing inventory, will be re-entered into the HUD Public and Indian Housing Information Center (PIC) in Fall 2009, and are planned to be returned to general use when the new assisted living project detailed in Section III is completed.

VHA plans an upgrade of 150 units of public housing at Skyline Crest through a sustainable moderate rehabilitation project under Option 4 of the Capital Fund Competitive Grant under the American Recovery and Reinvestment Act of 2009. Skyline Crest was built in 1963 and consists of units ranging from one to four bedrooms configured as duplexes and fourplexes. VHA hired a consulting team comprised of private firms that specialize in energy/green retro-fit. Based on the teams' analysis and recommendation, a plan to transform Skyline Crest into a green community has been developed with an estimated total cost of \$2,230,800. VHA will contribute \$450,000 of its capital fund monies toward the project and has applied for a grant of \$ 1,147,500. VHA's community partners will contribute \$360,000 to make up the difference.

Table 1 shows the planned capital activities for 2010, including the Capital fund portion of the green retrofit of Skyline Crest, weatherization and upgrades to other public housing units, funding for development activity, and support for the Rise & Stars Community Center.

VHA will continue developing the Burton Ridge project in 2010 or possibly later depending on economic conditions. Under consideration is the inclusion of Public Housing replacement units as one component of this mixed finance project. Additional information about Burton Ridge is in Section III.

The phased disposition of scattered site public housing units will continue through 2010. Beginning in 2009, VHA began the planned sale of 89 scattered site public housing single family units. VHA has received additional Housing Choice Vouchers for use by residents displaced by this action and is planning replacement public housing units as well. The number of units to be sold in 2010 will depend on the local market. VHA may seek approval to remove one additional public housing unit in Skyline Crest in order to accommodate improvements to community center and maintenance facilities.

VHA currently has 1898 Housing Choice Vouchers in the MTW block grant and an additional 89 Disposition vouchers that will become part of the block grant. VHA also has 70 VASH, 75 Mainstream, and 50 FUP vouchers for a total of 195 special purpose vouchers under separate Annual Contributions Contracts. In addition, VHA administers over 300 incoming portable vouchers from other housing authorities. VHA currently has 73 vouchers committed to project-based properties and plans to make additional project-based vouchers available. These will be used to partner with local non-profits who provide services to high need families, and to projects such as Burton Ridge and

TABLE 1
2010 PLANNED MTW CAPITAL FUND ACTIVITIES

Community	Planned Activities	Budget
Skyline Crest	Moderate Rehabilitation	\$ 450,000
Scattered Sites	Weatherization & Interior Upgrades	\$ 200,000
Public Housing	Development Activities	\$ 200,000
VHA Wide	Capital Program Administration & Community Center Program	\$ 160,000
Total 2010 Public Housing Capital Budget		\$1,010,000

the Van Vista addition that will serve populations not able to utilize tenant-based vouchers. In addition to the project based housing with services, VHA will consider project-basing vouchers at private sector projects that increase housing choice in higher income areas where the property owner agrees to make rents affordable to voucher holders. A total of up to 200 vouchers may be project-based by the end of 2010.

The vouchers currently project-based include 50 at the following properties: Maple Knoll (25), Plum Meadows (8), Esther Short (7), Anthem Park (3), and Springbrook (7). Additionally we have committed to

project-base 6 units at The Mews at Cascadia Village to be used by participants of the Supportive Housing Program and 3 units at Cascadia Village Apartments for residents receiving services under HOPWA through a partnership with ACE (Affordable Community Environments).

We may also consider adding 14 units at Pinewood Terrace for participants receiving self-sufficiency services through community partners and may add additional units to the service assisted housing at Maple Knoll. Table 2 contains a description of each project-based project.

**TABLE 2
2010 ONGOING AND PLANNED PROJECT BASED PROJECTS**

Current Projects			
Property	Vouchers	Partnering Agency	Description
Maple Knoll	25	SHARE/Aspire, 2nd Step Housing, Open House Ministries, Salvation Army, Columbia River Mental Health, Clark College	A 148 unit property consisting of two-bedroom one-bath dwelling units located in 19 buildings.
Plum Meadows	8	SHARE/Aspire, 2nd Step Housing, Open House Ministries, Salvation Army, Columbia River Mental Health, Clark College	The property consists of 17 buildings and includes 162 units consisting of 16 studio, 36 one-bedroom one-bath, 62 two-bedroom one-bath, 16 two-bedroom two-bath and 32 three-bedroom two-bath units.
Esther Short	7	SHARE/Aspire, 2nd Step Housing, Open House Ministries, Salvation Army, Columbia River Mental Health, Clark College	The property is a one-building complex which includes four floors of 160 units consisting of 96 one-bedroom one-bath, 61 two-bedroom one-bath and 3 three-bedroom two-bath units, which are located over ground floor commercial/retail.
Anthem Park	3	SHARE/Aspire, 2nd Step Housing, Open House Ministries, Salvation Army, Columbia River Mental Health, Clark College	The property consists of 58 units with 46 one-bedroom one-bath, 8 two-bedroom one-bath and 4 two-bedroom two-bath units, housed in one building.
Springbrook	7	SHARE/Aspire, 2nd Step Housing, Open House Ministries, Salvation Army, Columbia River Mental Health, Clark College	The property consists of 24 buildings which include 290 units with 46 studio, 28 one-bedroom one-bath, 50 two-bedroom one-bath, 128 two-bedroom two bath townhome, 36 three-bedroom two-bath townhome and 8 four-bedroom one-bath townhome units.
Projects Planned for 2010			
Property	Vouchers	Partnering Agency	Description
The Mews	6	Affordable Community Environments (ACE)	The property consists of 3 buildings containing 24 units: 8 one bedroom units, 6 two bedroom units, 6 three bedroom units and 4 four bedroom units.
Cascadia Village	3	Affordable Community Environments (ACE)	The property consists of 7 buildings containing 51 units: 6 studio units, 13 one bedroom units, 12 two bedroom units, 14 three bedroom units and 6 four bedroom units.
Pinewood	14	SHARE/Aspire, 2nd Step Housing, Open House Ministries, Salvation Army, Columbia River Mental Health, Clark College	The property consists of 5 buildings containing 22 two-bedroom one bath units, and 3 one-bedroom one-bath units.

LEASING INFORMATION

VHA plans to have a minimum of 485 public housing units leased in 2010. This assumes that the disposition of 89 single family homes is completed and the replacement units are not ready for occupancy. The actual number leased will likely be higher due to the phased sale and possible continued occupancy of some of the units to be disposed during the plan year.

All of VHA's public housing stock is part of the MTW demonstration.

VHA anticipates a lease rate in the HCV program of 98% of available vouchers in 2010. This projection also assumes 100% utilization of the HCV housing assistance funding. We are projecting that the current gap between the amount funded for the number of vouchers under contract and the actual cost will continue.

The public housing program has experienced some minor difficulty in leasing units in the past due to the policy of multiple offers made to applicants and some issues with the location of certain properties. The current and proposed site based waiting lists described below is intended to resolve this issue. The HCV program continues to enjoy a success rate of over 90% and VHA does not anticipate any difficulties in leasing vouchers.

WAITING LIST INFORMATION

VHA plans to breakout additional site-based lists from the general public housing waiting list in 2010. In addition to the site-based lists for Van Vista elderly housing, Van Vista assisted living, and the Fruit Valley property, a site-based list is planned for both the Camas and Ridgefield properties due to their locations. In addition a site-based list is planned for the Skyline Crest property due to the planned Campus of Learners MTW activity described in Section V. When completed the public housing program will have a hybrid waiting list system with a community wide list for most units, and site specific lists for those public housing properties with special

programs, populations, or locations. This system will streamline the intake process while preserving choice between units for most applicants.

In addition to new site-based waiting lists in public housing, VHA plans two new local preferences for both the HCV and public housing waiting lists. The first will be a preference for applicants not already housed in subsidized housing. This preference will assure that available units and vouchers go to those with the most immediate need. This preference is also described in Section V as it will require authority under MTW to waive regulation. The second planned new local preference is one for families with children, the elderly, and disabled over others on the waiting list. This preference will assure that assistance goes to the most vulnerable applicants.

Once these new preferences are implemented the complete list of local preferences for the HCV program will consist of:

- A preference for VHA Public Housing tenants who are eligible to participate in the Housing Choice Voucher Homeownership Program. This preference is limited to 5 applicants per calendar year.
- Preference for graduates from an approved two-year transitional or housing-first supportive housing program operated by an agency that has a Memorandum of Understanding (MOU) with the VHA. This preference is limited to 25 applicants per calendar year.
- Preference for tenants displaced by VHA disposition, acquisition, or condemnation actions.
- Preference for elderly families, disabled families, and Families with children or disabled dependents
- Preference for families not already housed in income based subsidized housing.

The local preferences for the Public Housing waiting lists will consist of:

- Preference for graduates from an approved two-year transitional or housing-first supportive housing program operated by an agency that has a Memorandum of Understanding (MOU) with the

VHA. This preference is limited to 25 applicants per calendar year.

- Preference for tenants displaced by VHA disposition, acquisition, or condemnation actions.
- Preference for families where the head, spouse, co-head, or sole member agree to and are eligible for participation in the Smart Choices program. This preference is limited to 25 applicants per calendar year.
- Preference for elderly families, disabled families, and families with children or disabled dependents
- Preference for families not already housed in income based subsidized housing.

The HCV waiting list and the general public housing waiting lists are currently closed and it is not anticipated that they will open in 2010. Some or all

of the site-based public housing lists may open, depending on the number of applicants already on the general list who choose to go on a site-based list as well.

The HCV waiting list currently has over 2800 applicants after a purge completed in 2009. Unless VHA receives a significant number of new vouchers in 2010, there will likely be over 2000 applicants on the list with a waiting time of about 6 years. The general public housing waiting list was also purged in 2009 and currently has over 1400 applicants. These two lists have been closed to new applicants since October 2006, yet retain high numbers of applicants demonstrating the continuing need for additional subsidized housing in our community.



VHA Public Housing Units at Skyline Crest

SECTION III

NON-MOVING TO WORK

HOUSING AUTHORITY INFORMATION

PLANNED SOURCES AND USES OF OTHER FEDERAL FUNDS

Table 3 lists planned sources and uses of Federal funds that are not part of the MTW demonstration. Totalling \$4.4 million in annual revenues, Other Federal funds, make up a significant portion of VHA's operating activities. We own and manage over 200 units with Section 8 HAP contracts and manage a number of Federal grants.

Some of these Federal grants are funded directly to the VHA and others are passed down from State of Washington, Clark County and City of Vancouver. We match Section 8, Public Housing and other tenants with grant funds to encourage self-sufficiency, employment readiness, young adult mentoring and housing stability. These aforementioned programs enhance VHA's ability as a Moving- to-Work agency to test alternate methods to promote independence from government assistance.

TABLE 3
PLANNED SOURCES AND USES OF OTHER FEDERAL FUNDS

Sources	
Rental Income	\$2,196,133
HUD and Other Grants	\$1,960,490
Other Revenue	\$209,680
Investment Income	\$36,926
Total	\$4,403,229
Uses	
Administrative Expenses	\$2,604,792
Maintenance	\$123,157
Utilities	\$251,702
Insurance and other Expenses	\$56,293
Housing Assistance Payments	\$443,427
Interest Expense	\$94,446
Capital Fund Expenditures	\$28,442
Less Principle & Reserve Contributions	\$402,608
Total	\$4,004,868
Net Income (Deficit)	\$398,361

NON-MTW ACTIVITIES PLANNED

New activities not requiring authority under MTW include the proposed changes to the waiting lists described in the previous section. Also described in the previous section is the transformation of Skyline Crest into a Green Community.

HOUSING STOCK NOT PART OF MTW

The VHA has two Section 8 New Construction communities, Cougar Homes and Columbia House. Five projects, known collectively as Cougar Homes, comprise 52 three- and four-bedroom single-family homes located in Vancouver and urban Clark County; these units were built in 1979. Columbia House is a high rise building for the elderly, located in downtown Vancouver. The Columbia House property consists of 151 units (143 one-bedroom and 8 two-bedroom), built in 1976.

The VHA owns four shelters: two homeless shelters, one women's domestic violence shelter, and one youth shelter. All are operated by local nonprofit service providers.

The VHA partners with other agencies and service providers to address specific housing needs in our community. These properties include assisted living facilities, a single room occupancy program located on Veterans Administration property, apartments for those with chronic mental disabilities, and other special needs housing.

The VHA manages 298 units of housing, in nine different properties, for Columbia Non-Profit Housing (CNPH). All of these properties are for elderly or disabled clients.

The VHA owns 2,049 units of workforce housing. The Workforce Housing initiative is a long-term strategy to diversify the housing authority, provide a

local source of funding for more deeply subsidized housing programs, and provide a future supply of quality affordable rental housing for our growing population. Workforce Housing is helping to revitalize communities and maintain a balance of affordable housing near jobs. These properties are located throughout the urban area and are financed with tax exempt mortgage revenue bonds, tax credits, and state and local grants and loans.

PLANNED CAPITAL ACTIVITY

A \$9.5 million dollar renovation of three Workforce Housing properties began in 2009 and will continue into 2010. These three complexes, Willow Creek, Cougar Creek, and Fishers Mill contain 578 units of affordable housing. An additional 5 million dollar renovation is planned for another 296 unit Workforce housing property, Springbrook Village, in 2010.

Columbia House will undergo re-roofing and insulation upgrades in 2010 at an estimated expense of \$100,000.

Utilizing a green retrofit stimulus grant, VHA will complete energy efficiency improvements at Skyline Crest Development. In addition to the stimulus funds, VHA will access stimulus weatherization funds through Clark County, and non-federal VHA funds. VHA will enter into an Energy Performance Contract with an Energy Service Company (ESCO) if determined to further enhance the development and if financially viable.

DEVELOPMENT ACTIVITY

New development activities for 2010 and beyond include Burton Ridge at Four Seasons, the Van Vista addition, the Camas development, and Battle Ground Village.

Burton Ridge is a mixed finance 172 unit senior housing project, with 80 independent living units (including 32 public housing units), 92 assisted living units (including 34 public housing units), and 16 memory care units. All of the units will serve extremely-low and very-low income seniors.

The Van Vista addition will result in 76 assisted living units located in downtown Vancouver. The project will be financed with LIHTC, the capital grant loan program, and other public sources. Some units will utilize project-based vouchers and others will be independent pay.

The Camas development will be a public bond and privately financed project and Battle Ground Village will be a 142 unit project utilizing public bond financing.

VHA may continue to acquire foreclosed properties, both single-family and multifamily properties if available, utilizing Neighborhood Stabilization Program (NSP) and private funding. VHA will develop a lease-purchase program for acquired single-family houses and public housing units currently being sold by the VHA.

VHA also plans to work with community partners to assess the need for housing for the disabled and to develop strategies to increase the available stock of affordable housing.

SECTION IV

LONG-TERM MTW PLAN

OUR MISSION

The mission of the Vancouver Housing Authority (VHA) is to provide opportunities to people who experience barriers to housing because of income, disability or special needs in an environment which preserves personal dignity and in a manner which maintains the public trust. In carrying out its mission, the Vancouver Housing Authority is committed to: Vital neighborhoods; Respect for VHA clients and employees; Excellence in management and operations; Cooperative and respectful working relationships with the public, neighborhood and community organizations, and other units of local government; and Dispersal of assisted housing throughout Clark County where warranted by need.

VHA's long-term MTW vision integrates the mission of the agency with the purposes of the MTW statute. The flexibility provided by the MTW Agreement will help the VHA realize its long-term vision and maximize the use of federally subsidized housing and rental assistance programs to meet the needs of the Vancouver/Clark County community.

ALIGNING WITH OTHER COMMUNITY HOUSING AND SERVICE PLANS

The VHA's vision includes aligning its MTW plan with other community housing and service plans to ensure that community resources are used effectively and efficiently—to leverage resources in the most effective and efficient manner.

HIGH PERFORMER STATUS

The VHA is committed to maintaining its High Performer status in its Public Housing and Section 8 Housing Choice Voucher programs. VHA intends to use its MTW flexibility to focus its resources and

adopt policies that support a high quality of service to its residents and to the community at large.

EXCELLENCE IN MANAGEMENT AND OPERATIONS

VHA intends to maximize efficient and effective delivery of its programs and will maintain its properties at or above community standards and demonstrate good stewardship of its properties, preserving them for future generations.

The VHA is committed to simplifying and streamlining program operations, eliminating unnecessary paperwork, and focusing its resources on providing direct service to residents in property management and promoting successful tenancy.

PROMOTING RESIDENT EMPOWERMENT AND SELF SUFFICIENCY

VHA will target resources and utilize MTW flexibility to address the statutory requirement of providing “incentives to families with children whose heads of households are either working, seeking work or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient.”

Priority will be given to policies and procedures that will assist residents in achieving self-sufficiency, including developing asset building initiatives, expanding resources and programs that promote self-sufficiency, and maintaining a Resident Advisory Board that provides a vehicle for resident input.

VHA is committed to enhancing opportunities for its residents and using its MTW status to create pathways that lead to self-sufficiency through targeted employment programs and opportunities for homeownership.

VHA sees self-sufficiency as a goal for all its residents—promoting employment and training opportunities for work-able adults, creating and enhancing programs to allow elderly residents to remain in their homes and be self-sufficient in daily living activities, and assisting youth in breaking the cycle of poverty.

PROMOTING HOME OWNERSHIP

Over 160 MTW program participants have purchased homes. Program participants seeking home ownership will receive one-on-one counseling, attend pre-purchase home ownership classes offered by a local nonprofit, and participate in post purchase follow up. Program participants may receive financial assistance from their Section 8 Housing Choice Voucher or be referred to local programs for down payment assistance.

MAXIMIZE THE USE OF FEDERALLY SUBSIDIZED HOUSING AND RENT ASSISTANCE

The Vancouver/Clark County community has grown rapidly in the past decade and the demand for decent, affordable housing far surpasses the supply. The VHA is working with community partners to maximize public housing and housing choice voucher resources by targeting resources and combining project based vouchers with service-enriched housing.

The VHA's MTW status allows it to make the best use of its Section 8 Housing Choice Voucher program to establish programs and create partnerships that serve the most vulnerable and expand opportunities for those seeking to break the cycle of poverty.

BUILDING COMMUNITY

For more than sixty years, the VHA has been engaged in building a healthy Vancouver/Clark County community and ensuring that there is a place for everyone, including low income and vulnerable

populations. We have learned that affordable housing, like roads, is part of the infrastructure of a healthy community. We have made some policy decisions that will impact all of our future developments.

- Future developments will include workforce as well as service-rich housing for special populations.
- Developments will serve to address one of the following: create affordable housing opportunities in high-cost areas, address a revitalization need of the community, provide housing for special needs populations near services, provide affordable housing in growth areas and along transportation routes.
- Replacement of units disposed will be planned in individual projects or accounted for in the overall housing portfolio. The housing portfolio will be reviewed for diversification needs, in that special needs programs requiring financial support will be adequately offset by market/near-market rate developments.
- Future project and program planning will be inclusive of City and County comprehensive plans. Developments will respond to noted types of populations with housing needs and geographic areas in which affordable housing opportunities are inadequate.

ADOPTING SUSTAINABLE PRACTICES

The VHA's vision includes being a good steward of the resources within its control. We will put into practice decision-making that will result in actions that, in the words of the World Commission on Environment and Development, "meet the needs of the present without compromising the ability of future generations to meet their own needs." The decisions we make today, in operations and in development, will achieve current objectives and also serve to sustain the agency and the community over time. We will practice energy conservation, reduce

environmental impacts, increase the durability of building components, reduce solid waste, achieve operational savings, and use sustainable building practices in affordable housing design. We will use the Evergreen Sustainable Development Criteria, developed by the state of Washington, in our new housing development. We will support other governmental, nonprofit, and for-profit entities in building a more sustainable Vancouver/Clark County community.

COMMUNITY PARTNERSHIPS

For all of its 67 years, the VHA has actively partnered with other community agencies and governmental entities to meet the housing needs of the community. The VHA works in partnership with

a variety of local agencies that provide services for residents, and throughout this plan there are references to these partnerships. MTW is a vehicle through which these partnerships can be enhanced.

Residents, program participants, and key community constituencies are at the root of VHA's long term planning. The agency's rich history of partnerships has resulted in innovations that have served the specific needs of residents and the establishment of programs and services, such as the Learn and Play program for the very young and Assisted Living for the frail elderly. Creation of a Resident Advisory Board provides a vehicle for resident empowerment and a vehicle for dialog. Creation of a Moving to Work Advisory Committee allows for greater participation from community stakeholders.



Vancouver Housing Authority Main Street Office

SECTION V

PROPOSED MTW ACTIVITIES: HUD APPROVAL REQUESTED

The following are newly proposed Moving to Work activities for 2010. VHA is seeking HUD approval for these activities. A table summarizing the proposed activities and their objectives, impacts, baselines, benchmarks, metrics, and authorizations can be found at end of this section on page 15.

MANDATORY REQUIREMENTS FOR WORK-ABLE ADULTS

DESCRIPTION

VHA continues to develop, consolidate and strengthen all of its offered resident initiative programs. A major component of this activity is the community service requirements under Section 12 of the 1937 Housing Act for public housing residents. We are proposing to use authority under MTW to create a community service and/or educational activities requirement for all work-able participants in the HCV program. No waiver or modification of community service requirements for public housing residents under Section 12 will occur.

VHA sees the requirement for community service in the Low Rent Public Housing Program as providing a chance for residents to be exposed to new experiences, thereby providing the opportunity for personal growth and self enrichment. It is our belief that the same advantages will accrue to Housing Choice Voucher participants. Giving people the opportunity to become involved is empowering in and of itself. Our partner agencies have also demonstrated to us that volunteer experiences can lead to developing job skills, building a work history and feeling good about accomplishments. There is value in work, whether it is for pay or in a volunteer capacity. Actively giving back to the community is a source of accomplishment and feeling useful. Meaningful work has positive effects on a person's belief about themselves and their ability to contribute

productively to the world in which they live. Residents can successfully fulfill this initiative by participating in a wide range of volunteer work as well as through classes and workshops, many of which will be offered at VHA sites. Achieving self sufficiency is a process. Actively participating in ones community, being exposed to new experiences, and learning new skills are steps in that process.

All work-able adults in public housing or HCV households who are working less than 25 hours per week, and are not otherwise exempt, will be required to participate in VHA Smart Choices or FSS programs, selected educational classes, or community service activities. Work-able is defined as an adult under the age of 62 and who is not disabled or is not the care provider for a disabled family member. Work-able adults will contribute a minimum of 8 hours per month and complete required documentation of compliance. VHA will provide both in-house opportunities and contact information for outside service and training opportunities. Households where work-able adults fail to meet this requirement will be given opportunity to make up the hours and will have access to the VHA grievance or hearing procedures. However, continued non-compliance by an eligible family member will eventually result in termination of assistance.

RELATION TO STATUTORY OBJECTIVES

This requirement will provide incentive to families with children that will assist them in becoming economically self-sufficient by encouraging employment and by providing education and training opportunities for those not employed.

IMPACT ON STATUTORY OBJECTIVE

It is anticipated that over time this initiative will result in a greater number of families with earned income and higher average earned income amounts.

BASELINE AND BENCHMARKS

The baseline will be the earned income amounts of HCV participants prior to implementation of the initiative. The benchmark will be a 10% increase in the average earned income after two years and a 20% increase in the number of families with work-able adults with earned income.

DATA COLLECTION AND METRICS

Metrics used will be the number of participating families with earned income as well as the average amount of earned income in Public Housing and HCV households. Data on family income is collected during recertification of family eligibility, entered into VHA's housing software, and will periodically reported on for measuring the outcome of this initiative.

AUTHORIZATIONS CITED

This MTW initiative is authorized under the Amended and Restated Moving to Work Agreement, Attachment C. Statement of Authorizations, Sections C. 5. and E.

INFORMATION FOR RENT REFORM

This MTW activity does not involve any change to the regulations found in 24 CFR 960 Subpart C or 24 CFR 982 Subpart K. Accordingly, it is not a rent reform activity and the additional information requirement is not applicable.

SKYLINE CREST CAMPUS OF LEARNERS

DESCRIPTION

The Skyline Crest Campus of Learners will be a partnership between the VHA and the residents of Skyline Crest to invest in the long-term success of every child and young adult living in the development. VHA will provide rich and varied activities to engage Skyline Crest children and young adults (ages 0-24) and their families in school and community, including homework help and tutoring, enrichment classes, clubs and activities, recreation, mentoring, and early childhood parent/child activities. Appropriate community partners will be

recruited to support this effort. VHA will also support parents and youth through family support and case management services and provide or link residents to volunteer opportunities for all ages. Each family will develop a success plan centered on their children's school attendance and community involvement, and will commit to helping make the community a positive, nurturing place for all youth. The lease will be modified to reflect the family's responsibilities, and lack of follow through on the success plan can result in loss of housing. Elderly and disabled Skyline Crest tenants are not required to participate, however activities will be open for them as well. In-place tenants who do not wish to participate will be given an opportunity to transfer to other public housing units. Mandatory requirements for work-able adults will also apply to Skyline Crest tenants with enhanced opportunities for participation with community partners such as Clark College.

RELATION TO STATUTORY OBJECTIVES

This initiative will provide incentive to families with children that will assist them in becoming economically self-sufficient through higher grade completion and graduation rates for all youth.

IMPACT ON STATUTORY OBJECTIVE

The initiative will result in higher rates of family commitment to educational achievement and higher rates of educational attainment.

BASELINE AND BENCHMARKS

The initial baseline, benchmarks, and metrics will be the number of families completing a Family Success Plan. The baseline is currently zero and the benchmark will be 90 families with a completed plan after one year.

DATA COLLECTION AND METRICS

In addition to the number of completed Family Success Plans, items to be tracked will be grade completion/advancement for all youth (youth being held back), high school graduation rates, the number of youth involved in the juvenile justice system, post-secondary education and training (entrance and completion), summer and post-secondary employment for youth, and community involvement

by youth and parents. This information will be collected by program staff during the process of developing Family Success Plans with participants and additional baselines and benchmarks established once initial data has been collected.

AUTHORIZATIONS CITED

This MTW initiative is authorized under the Amended and Restated Moving to Work Agreement, Attachment C. Statement of Authorizations, Sections C. 5. and C.10.

INFORMATION FOR RENT REFORM

This MTW activity does not involve any change to the regulations found in 24 CFR 960 Subpart C or 24 CFR 982 Subpart K. Accordingly, it is not a rent reform activity and the additional information requirement is not applicable.

USE OF S8 OR S9 FUNDS FOR MTW VOUCHERS AND/OR NEW DEVELOPMENT

DESCRIPTION

Vancouver Housing Authority intends to request an amendment to the MTW Restated Agreement and to this Annual Plan in 2010 in order to utilize broader use of funds for the development of housing opportunities for low and very-low income households. Projects currently under development are Camas Ridge, Van Vista Addition, and the potential use of Neighborhood Stabilization Funds to replace subsidized units previously disposed by the VHA. When plans are more fully developed they will be submitted to HUD following the steps identified in the 10/6/2009 letter from Assistant Secretary Henriquez and will include the required elements for a proposed MTW activity outlined in Attachment B of the Restated Agreement.

WAITING LIST LOCAL PREFERENCE FOR APPLICANTS WITHOUT SUBSIDIZED HOUSING

DESCRIPTION

This initiative would create a local preference on the public housing and HCV waiting list for applicants without subsidized housing. This will assure that available units and vouchers go first to those most vulnerable and/or rent burdened. It will require authorization under MTW because HCV regulations do not allow a local preference that excludes a public housing resident.

RELATION TO STATUTORY OBJECTIVES

The preference will achieve programmatic efficiency and reduce costs currently incurred when housing a person already in a VHA program, or other rent subsidy programs such as HUD 202 and project based Section 8.

IMPACT ON STATUTORY OBJECTIVE

New lease-ups will no longer create another vacancy requiring additional expense to fill.

BASELINE AND BENCHMARKS

Baseline and benchmarks will be based on the imputed expense of additional unit turnovers had these applicants been selected.

DATA COLLECTION AND METRICS

Metrics will be based on the number of applicants on waiting lists without the preference. An analysis will be made periodically to determine the number of additional unit turnovers and expenses that would have occurred without this preference in place.

AUTHORIZATIONS CITED

This MTW initiative is authorized under the Amended and Restated Moving to Work Agreement, Attachment C. Statement of Authorizations, Sections C. 2. and D. 4.

INFORMATION FOR RENT REFORM

This MTW activity does not involve any change to the regulations found in 24 CFR 960 Subpart C or 24 CFR 982 Subpart K. Accordingly, it is not a rent reform activity and the additional information requirement is not applicable.

TABLE 4
2010 PROPOSED MTW ACTIVITIES: HUD APPROVAL REQUESTED

MTW Activity	Statutory Objective	Anticipated Impacts	Metrics	Baseline	Benchmarks	Data Collection Protocols	Authorization Cited	Rent Reform Information
Mandatory Requirements for Work-Able Adults	Provide incentive toward becoming economically self-sufficient	Increase the number of families with earned income and the amounts of earned income	Average earned income of work-able households Number of work-able households with earned income	\$16,102 average earned income 12/2009 46.52 % of work-able households have earned income 12/2009	Average earned income increase to \$17,712 after two years (10% higher) 55.82% of households have earned income after two years. (20% increase)	Periodic reports from VHA housing database on household income sources and amounts	Sections C.5. & E. of Attachment C of the Amended & Restated MTW Agreement	Not Applicable
Skyline Crest Campus of Learners	Provide incentive toward becoming economically self-sufficient	Higher graduation and grade completion rates among campus youth	The number of households who complete a Family Plan (Additional metrics and benchmarks to be developed)	Zero Family Plans completed	90 households completing a Family Success Plan.	Information on completed success plans and school achievement collected by program staff and periodically reported on.	Sections C.5. & C.10. of Attachment C of the Amended & Restated MTW Agreement	Not Applicable
Waiting list Preference for Applicants Without Subsidized Housing	Achieve programmatic efficiency and reduce costs	A reduction in the number of intake processes and unit turnovers	The number of applicants on waiting lists without this preference and the imputed reduction in unit turnovers	The estimated number of unit turnovers that would have occurred without the preference in place, based on the number of PH residents on the list (125 in 12/2009).	An estimated savings of 8 fewer unit turnovers annually at an average cost of \$3000 per turnover.	Periodic reports from VHA housing database on number of waitlist applicants by date and preference	Sections C.2. & D.4. of Attachment C of the Amended & Restated MTW Agreement	Not Applicable

SECTION VI

ONGOING MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

In this section of the plan an update is provided on the Moving to Work activities proposed and approved in previous plans. The activities are grouped according to the MTW statutory goal most impacted by the activity. Many of the VHA's initiatives under the MTW program impact more than one statutory goal; in those cases the activity is listed under the goal believed to be the most impacted.

The VHA is not currently using outside evaluators for any MTW activities. Tables at the end of this section list ongoing and past MTW Activities.

ACTIVITIES THAT REDUCE COSTS AND PROVIDE GREATER COST EFFECTIVENESS

ALTERNATE REQUIRED REEXAMINATION SCHEDULE

VHA proposed and implemented a biennial schedule for required reexaminations with the FY2007 Annual Plan. Each year, at the anniversary date of their lease, 50% of families in both Public Housing units and the in the HCV program receive a full reexamination of eligibility. The other 50% of families receive a simplified review where the family completes a declaration of eligibility but no verifications or changes are usually made. This activity has resulted in substantial cost savings through reduced staff time spend on reexamination.

Included in an amendment to the VHA 2009 Annual Plan was a proposal to modify this activity. Elderly and Disabled families on fixed income will have their full reexaminations extended to once every three years. Other families will return to an annual schedule of reexamination. This modification will result in little change in the total number of reexaminations performed each year (maintaining the cost savings), and will allow for more frequent contact with those families most likely to have

changes. This modification is anticipated to be implemented in late 2009.

RESET OF REQUIRED REEXAMINATION SCHEDULE AFTER INTERIM REVIEW

Proposed and implemented in an amendment to the FY2009 Plan, this activity is closely related to the previously described reexamination schedule. For those HCV and Public Housing families returning to an annual schedule if an interim reexamination is performed (typically at the family's request due to an income reduction) their next required reexamination will not be due until one year after the effective date on the interim. This activity will reduce even further the number of reexaminations required to be performed each year and will result in additional cost savings. No changes to this activity are anticipated in 2010.

SIMPLIFIED FAMILY DECLARATION OF ELIGIBILITY

This MTW activity is also related to required reexaminations and was originally proposed by a member of the Resident Advisory Board. Declaration forms for the reexamination process are created using individual family data from the previous examination allowing the family to simply certify that there have not been any changes or to note just the changes on the form. For those families not on fixed income and with no changes, VHA staff will obtain verification every other year if no discrepancies on EIV are noted. Proposed and implemented in an amendment to the FY2009 Plan, no changes are anticipated in 2010.

ALTERNATE REQUIRED INSPECTION SCHEDULE FOR HCV PROGRAM

Although discussed in both the 2008 and 2009 MTW Plans, the final design of this activity was proposed and implemented in an amendment to the FY2009 Plan. In the HCV program the VHA will physically

inspect each unit every two years with a self-certification to be completed by the landlord and tenant on years an inspection is not done. VHA will continue to perform pre-contract inspections and respond to any complaints. No changes to this activity are anticipated for 2010.

ELIMINATION OF MEDICAL EXPENSE DEDUCTION

This rent reform initiative was proposed in an amendment to the VHA 2009 Annual Plan and implementation was begun late in 2009. Elderly and disabled families will no longer be eligible to have unreimbursed medical expenses in excess of 3% of their annual income deducted from their annual income. In return the mandatory \$400 deduction for all elderly and disabled families will be increased to \$700. The cost reductions anticipated to be obtained from this initiative are administrative savings due to the reduction in verifications and other paperwork. Any potential savings in housing assistance is offset by the increase in the standard deduction. This initiative covers families in both Public Housing and the HCV program and no changes are expected in 2010.

LIMIT CONTRACT RENT INCREASES IN THE HCV PROGRAM TO ONE PER YEAR

Proposed and implemented in an amendment to the FY2009 Plan, this activity is intended to address a recent occurrence in the HCV program where a few owners were increasing rent two or more times a year (after the initial required lease term of one-year). This activity will result in a small cost savings due to less processing. No changes are anticipated for 2010.

VERIFICATION OF ASSETS LIMITED TO THOSE DECLARED GREATER THAN \$5000

This activity was proposed in the VHA 2009 Plan and was implemented January 1, 2009. Cost savings through the elimination of staff time spent obtaining verifications for insignificant income derived from family assets has been achieved. No changes in this activity are planned for 2010.

SIMPLIFIED DEVELOPMENT PROCESS

Proposed and implemented in the FY2009 Plan, the MTW component of this process allows the VHA to purchase property without prior HUD approval provided that HUD site selection criteria are met. No changes are planned for 2010.

INVESTING IN STATE PERMITTED INSTRUMENTS

Proposed and implemented in the FY2009 Plan, this policy allows the VHA to obtain a greater return on investments. No changes to this policy are planned for 2010.

ALTERNATE ASSET MANAGEMENT IN PUBLIC HOUSING

Proposed in the FY 2008 Annual Plan and implemented that year, asset management at the VHA will continue to evolve in 2010. VHA has divided the public housing stock into 4 AMPs, each staffed separately for housing eligibility and most management functions. VHA retains some centralized functions in cases where it is more cost effective. VHA has hired a management consultant to review the current configuration and recommend improvements. Depending on the extent of these recommendations, VHA may make minor organizational changes in 2010.

ALTERNATE PROCESS FOR DETERMINING RENT REASONABLENESS IN HCV PROGRAM

Proposed in the FY2006 Annual Plan and Implemented that year, VHA's rent reasonableness process uses locally obtained data on the rental market to establish average prices for different unit sizes, types, and locations. Inspectors note the presence or absence of amenities to determine reasonable rents in relation to the average market rates. No changes to this process are planned for 2010.

PUBLIC HOUSING RENT CALCULATION INCOME BASED ONLY

In place since VHA's original Moving to Work agreement in 1999, VHA calculates rent based on income for public housing tenants and does not offer the flat rent option required of non-MTW agencies.

By not offering this option VHA achieves some cost savings, but also preserves the public housing stock for low-income tenants. VHA does not anticipate any changes to this policy in 2010.

NO EARNED INCOME DISALLOWANCE IN PUBLIC HOUSING

In place since 1999, VHA did not implement EID in Public Housing because it directly conflicted with the earlier MTW initiative of mandatory self-sufficiency contract participation with escrow accounts. Disallowing earned income would have prevented development of tenant escrow accounts. At this time VHA continues to offer escrow accounts (through the FSS program) and believes the asset development that escrow accounts provide is a more effective incentive toward self-sufficiency than a disallowance. In addition, the cost savings from reduced staff time that would be spent on tracking disallowance period is significant. VHA does not anticipate any changes in 2010.

ACTIVITIES THAT GIVE INCENTIVES TOWARD ECONOMIC SELF-SUFFICIENCY

RENTER EDUCATION PROGRAM

Proposed and implemented in an amendment to the FY2009 Plan, VHA requires all new applicants selected from the public housing and HCV waiting lists to take renter education classes modeled on the locally developed Ready to Rent program. VHA expects that applicants will be far more successful in locating quality housing, having improved relations with landlords, and in budgeting and other financial matters. No changes in this activity are expected in 2010.

WAITING LIST PREFERENCE FOR PARTICIPATION IN SELF-SUFFICIENCY PROGRAMS

Proposed in an amendment to the FY2009 Plan, this waiting list local preference has been modified due to the requirements of the NOFA that is currently funding Service Coordinators for the HCV and public housing Family Self-Sufficiency (FSS) programs. No

preference is given for participation in an FSS program so the preference no longer requires authority under MTW. The preference is retained in for public housing for participation in the Smart Choices self-sufficiency program.

40% MAXIMUM FAMILY SHARE FOR ONGOING TENANCY IN HCV PROGRAM

Proposed and implemented in an amendment to the FY2009 Plan, this policy extends the 40% maximum family share to ongoing tenancy in the HCV program. The policy allows participants up to one-year to increase income, join a self-sufficiency program, or obtain an exemption through the hardship policy before being required to move to a less expensive unit. No changes to the policy are expected to be made in 2010.

LIMITED UTILITY ALLOWANCE PAYMENTS

Proposed and implemented in an amendment to the FY2009 Plan, this policy provides for the elimination of a UAP for a household in either the public housing or HCV programs after six months. No changes to this policy are anticipated to be made in 2010.

SELF-SUFFICIENCY PILOT PROGRAM WITH MANDATORY PARTICIPATION

Yes We Can was proposed in an amendment to the FY2009 Plan, This program has been suspended in order for the VHA to focus on other self-sufficiency programs including the recently funded public housing FSS program.

ASSET BUILDING PROGRAM

Proposed in the FY2009 Plan, and expanded upon in the March 2009 amendment to the 2009 Plan, the component of this initiative for an alternative to the FSS escrow has been tabled due to the need to conform to the service coordinator NOFA grants awarded the VHA in 2009. However the VHA continues to actively develop this initiative through a local community coalition that includes financial institutions. The Asset Building Coalition continues to identify resources and develop financial literacy training and other asset building activities. VHA may utilize single fund flexibility under MTW to further this activity in 2010.

PILOT RENTAL SUBSIDY PROJECT

First proposed in the FY2008 Plan, this project has been tabled until such time as funding can be secured for the case management component. In addition VHA is waiting for clarification from HUD with regard to the use of funding in the MTW demonstration for housing assistance programs outside of Section 8 and 9.

IMPUTED TANF INCOME FOR VOLUNTARY GRANT CLOSURES

First proposed in the FY2009 Plan, this MTW policy provides incentive for public housing and HCV households who are also TANF recipients to comply with work requirements. The policy extends the conventional imputed TANF income requirement to voluntary closures instead of being limited to sanctions. No change to the policy is anticipated for 2010.

ENHANCED FSS AND ROSS PROGRAMS

Initially provided for in the 1999 MTW Agreement, forfeited escrow fungibility was added in 2006. VHA will continue to use single fund flexibility to support these programs with no changes expected to be made.

RISE & STARS COMMUNITY CENTER

Initially provided for in the 1999 MTW Agreement, forfeited escrow fungibility was added in 2006. VHA uses the single fund flexibility provided under MTW to supplement activities at the community center including funding the administration of the center with capital funds. No change is anticipated for 2010.

ACTIVITIES THAT INCREASE HOUSING CHOICE FOR LOW-INCOME FAMILIES

PROJECT-BASED VOUCHERS TIED TO SERVICES

Proposed and implemented in an amendment to the FY2008 Plan, the VHA will continue to expand the

project-based program in 2010. VHA uses authorization to waive a number of regulations governing project-based vouchers. This includes waiver of the bidding process for VHA owned units, time limits on assistance, no tenant based voucher available after one-year, and tenant selection by the partnering agency with no notification to the HCV waiting list. The program allows for voucher assistance to be made available to special populations and for services attached to the housing. No changes are expected in 2010.

MODIFIED HCV HOMEOWNERSHIP PROGRAM

First proposed in the FY2008 Plan, VHA's program provides for a shorter period of mortgage assistance than the conventional program. No changes are expected to be made in 2010.

SINGLE UTILITY ALLOWANCE SCHEDULE FOR HCV PROGRAM

This initiative was proposed and implemented in an amendment to the FY2009 Plan. The policy provides several benefits through simplification of the assistance calculation in the HCV program. It allows for specific rent limits to be provided to new and moving voucher holders, making their housing search much easier; it provides an incentive for families to select "greener" rental units and to conserve energy usage; and it provides the information needs so HCV participants can make more informed choices. No changes are expected to be made in 2010.

PROGRAM BASED WAITING LIST

A separate waiting list for the assisted living program within a Public Housing site was proposed in an amendment to the FY2009 Annual Plan. This MTW policy provides for a simplified tenant selection process for the public housing units designated for applicants requiring assisted living services. No change is anticipated for 2010.

**TABLE 5
ONGOING MTW ACTIVITIES – HUD APPROVAL PREVIOUSLY GRANTED**

Activity	Plan Year Identified	Current Status
Alternate Required Reexamination Schedule	FY2007 Annual Plan	Ongoing with modifications
Reset of Required Reexamination Schedule after Interim Review	FY2009 Plan Amendment	Ongoing
Simplified Family Declaration of Eligibility	FY2009 Plan Amendment	Ongoing
Alternate Required Inspection Schedule for HCV Program	FY2009 Plan Amendment	Ongoing
Elimination of Medical Expense Deduction	FY2009 Plan Amendment	Ongoing
Limit Contract Rent Increases in the HCV Program to one per Year	FY2009 Plan Amendment	Ongoing
Verification of Assets Limited to those Declared Greater than \$5000	FY2009 Plan	Ongoing
Simplified Development Process	FY2009 Plan	Ongoing
Investing in State Permitted Instruments	FY2009 Plan	Ongoing
Alternate Asset Management in Public Housing	FY2008 Plan	Ongoing
Alternate Process for Determining HCV Rent Reasonableness	FY2006 Plan	Ongoing
Public Housing Rent Calculation Income Based Only	1999 MTW Agreement	Ongoing
No Earned Income Disallowance in Public Housing	1999 MTW Agreement	Ongoing
Renter Education Program	FY2009 Plan Amendment	Ongoing
Waiting List Preference for Participation in Self-Sufficiency Programs	FY2009 Plan Amendment	Eliminated
40% Maximum Family Share for Ongoing Tenancy in HCV Program	FY2009 Plan Amendment	Ongoing
Limited Utility Allowance Payments	FY2009 Plan Amendment	Ongoing
Self-Sufficiency Pilot Program With Mandatory Participation	FY2009 Plan Amendment	Suspended
Asset Building Program	FY2009 Plan	Developing
Pilot Rental Subsidy Project	FY2008 Plan	Suspended
Imputed TANF Income for Voluntary Grant Closures	FY2009 Plan	Ongoing
Enhanced FSS and Ross Programs	1999 MTW Agreement	Ongoing
Rise & Stars Community Center	1999 MTW Agreement	Ongoing
Project-Based Vouchers Tied to Services	FY2008 Plan	Ongoing
Modified HCV Homeownership Program	FY2008 Plan	Ongoing
Single Utility Allowance Schedule for HCV Program	FY2009 Plan Amendment	Ongoing
Program Based Waiting List	FY2009 Plan Amendment	Ongoing

**TABLE 6
PAST MTW ACTIVITIES – NO LONGER IN EFFECT**

Activity	Plan Year Identified	Plan Year Concluded
All Voucher Port-Ins Absorbed by the VHA	1999 MTW Agreement	FY2001 Plan
Mandatory Participation in MTW Self-Sufficiency Program	1999 MTW Agreement	FY2005 Plan
Five-Year Time Limit on Housing Assistance	1999 MTW Agreement	FY2005 Plan
FSS Program absorbed into MTW Self-Sufficiency Program	1999 MTW Agreement	FY2005 Plan
All Households Able to Create Escrow Accounts	1999 MTW Agreement	FY2005 Plan
Restriction on Voucher Port-Outs	1999 MTW Agreement	FY2005 Plan
Maximum Family Share of Contract Rent at 45% of Gross Income	1999 MTW Agreement	FY2008 Plan
8% of Gross Earned Income Deduction	FY2001 Plan	FY2004 Plan
\$480 Deduction per Child for Child Support Payments	FY2001 Plan	FY2004 Plan
Escrow Accounts Capped at \$6000	FY2003 Plan	FY2005 Plan
Flat Rent/Subsidy Calculation in Public Housing & HCV Program	FY2007 Plan	FY2008 Plan (Never Implemented)

SECTION VII

SOURCES AND USES OF FUNDING

PLANNED SOURCES AND USES OF MTW FUNDS

We look forward to stable Federal funding in 2010 to continue MTW efforts including MTW Vouchers for those with a special preference. We may use MTW funds to augment development efforts to add hard low income housing units. Given Clark County's growth, creating additional housing units continues to be a goal of the VHA.

sources is rental income from public housing residents and investment income from MTW reserves. Other revenue under sources includes administrative fees earned from incoming HCV port-ins, COCC Fees and charges to tenants for the public housing program. The uses section of the table details anticipated expenditures by the type of expense. Included in the line for administrative expense is some flexible use of MTW funds for the VHA Community Center and for contracts with third party social service providers providing renter education and other services.

Table 7 details the anticipated sources and uses of funds for Moving to Work activities. Included in

**TABLE 7
PLANNED SOURCES AND USES OF MOVING TO WORK FUNDS**

Sources	Public Housing	Capital Fund Program	HCV Program	Total MTW Funds
Rental Income	\$1,019,105	\$0	\$0	\$1,019,105
HUD and Other Grants	\$1,570,565	\$1,010,000	\$12,457,728	\$15,038,293
Other Revenue*	\$432,171	\$0	\$210,171	\$642,342
Investment Income	\$74,632	\$0	\$58,438	\$133,070
Total	\$3,096,472	\$1,010,000	\$12,726,337	\$16,832,809
Uses				
Administrative Expenses	\$2,131,597	\$160,000	\$1,488,001	\$3,779,597
Maintenance	\$314,083	\$0	\$5,296	\$319,379
Utilities	\$268,778	\$0	\$0	\$268,778
Insurance and other Expenses	\$82,436	\$0	\$4,216	\$86,651
Housing Assistance Payments	\$0	\$0	\$11,044,729	\$11,044,729
Interest Expense	\$617	\$0	\$0	\$617
Capital Fund Expenditures	\$32,973	\$850,000	\$47,907	\$930,879
Less Principle & Reserve Contributions	\$1,064	\$0	\$0	\$1,064
Total	\$2,831,547	\$1,010,000	\$12,590,149	\$16,431,696
Net Income (Deficit)	\$264,925	\$0	\$136,189	\$401,114

*Includes public housing COCC fees, charges to tenants, and Voucher port-in administrative fees

PLANNED SOURCES AND USES OF STATE & LOCAL FUNDS

VHA has taken the strategy of developing mixed income communities using its bonding capacity since the early 90's. Next year's plan includes projects that continue in the same genre, with the addition of leveraging MTW funds and rental subsidy.

Additionally, VHA has been working with Clark County and City of Vancouver to actively pursue economic recovery efforts. VHA negotiated the first public-entity purchase of Fannie Mae foreclosed homes, to convert empty homes to rentals and to create an inventory of homes for first time homebuyers once the market has rebounded. We plan to continue similar efforts into 2010.

Table 8 details anticipated revenue and expenses from state and local sources for 2010.

**TABLE 8
PLANNED SOURCES AND USES OF STATE & LOCAL FUNDS**

Sources	
Rental Income	\$9,967,370
HUD and Other Grants	\$450,918
Other Revenue	\$2,159,218
Investment Income	\$3,281,670
Total	\$15,859,176
Uses	
Administrative Expenses	\$4,633,280
Maintenance	\$1,245,881
Utilities	\$1,254,750
Insurance and other Expenses	\$251,097
Housing Assistance Payments	\$77,850
Interest Expense	\$6,109,521
Capital Fund Expenditures	\$132,540
Less Principle & Reserve Contributions	\$2,000,128
Total	\$15,705,046
Net Income (Deficit)	\$154,130

**PLANNED SOURCES AND
USES OF CENTRAL OFFICE COST
CENTER FUNDS**

Table 9 details sources and uses of the Central Office Cost Center Funds. VHA is creating a central maintenance function within the COCC starting in 2010 for unit turnover activities which will be charged back to the individual AMPS.

**TABLE 9
PLANNED SOURCES AND USES OF COCC FUNDS**

Sources	
Rental Income	\$0
HUD and Other Grants	\$2,679
Other Revenue	\$379,576
Investment Income	\$74,270
Total	\$456,525
Uses	
Administrative Expenses	\$342,862
Maintenance	\$0
Utilities	\$0
Insurance and other Expenses	\$0
Housing Assistance Payments	\$0
Interest Expense	\$0
Capital Fund Expenditures	\$0
Less Principle & Reserve Contributions	\$0
Total	\$342,862
Net Income (Deficit)	\$113,663

COST ALLOCATION OR FEE-FOR-SERVICE

VHA's cost allocation approach does not differ from the 1937 Act requirements and is in compliance with OMB Circular A-87. VHA uses a fee-for-service approach to charge back the central maintenance activity on an hourly basis.

**USE OF SINGLE-FUND
FLEXIBILITY**

VHA proposes to use single fund flexibility amongst all three Federal programs of Housing Choice Voucher (HCV), Capital Fund Program and Low Rent Public Housing in the following manner.

HCV

As a Section 8 Block Grant agency, we plan to spend the annual funding allocation between HAP and Administrative fees in a manner to meet our program goals while serving approximately the same number of families.

New activities include emphasis on promoting resident empowerment and self sufficiency through tenant education and counseling. Planned activities will benefit participants in Section 8 and Public Housing as well as those on the waiting list.

Further we propose to use HCV funds towards the creation of additional affordable housing as permitted in the Agreement.

CAPITAL FUND PROGRAM

We intend to continue to use CFP to help fund adult and children education programs at the Rise and Stars Community Center. The majority of funds will continue to go towards physical rehabilitation of property. Future Capital Fund Program will include repayment of a proposed capital grant loan for new unit development and community center and maintenance facility improvements.

LOW RENT PUBLIC HOUSING

For the 2010 Plan year, we do not intend to use Public Housing operating funds for anything other

than operations of the 575 units of Public Housing. We want to be conservative in this area given the additional administrative burden of dividing properties into four separate AMPS and the administrative requirements of project based accounting and FDS reporting.

RESERVE BALANCES

HCV and Low Rent Public Housing reserves are expected to remain stable for the rest of the year and into the 2010 Plan year. Other Federal programs will

remain stable as well. Local Program reserves include a recent bond issue of \$9 million which is expected to be spent on renovation of three project over the next ten months.

TABLE 10
RESERVE BALANCES AS OF MARCH 31, 2009

HCV	\$3,062,855
Low Rent	\$1,417,371
Other Federal Funds	\$790,050
Local Programs	\$20,107,073



Esther Short Commons, a VHA Workforce Housing project in downtown Vancouver

SECTION VIII

ADMINISTRATIVE

BOARD RESOLUTION

The Board of Commissioners of the Vancouver Housing Authority passed resolution No. 2842 on September 23, 2009 approving the 2010 Moving to Work Annual Plan and adopting the Annual Moving to Work Plan Certifications of Compliance.

PUBLIC PROCESS

In developing the 2010 MTW Annual Plan VHA staff met and worked with the Resident Advisory Board (RAB) and the MTW Advisory Committee. Members of the RAB and the Committee provided ideas for new initiatives under the MTW program and feedback during the design phase of proposed initiatives. These meetings occurred on July 13th, 14th, and 30th, 2009.

The 2010 MTW Annual Plan was published on August 4, 2009 for a 30-day comment period. A public hearing was held on September 3, 2009. The 2010 MTW Annual Plan was posted on the VHA website and copies were made available at the VHA administrative office and the RISE & STARS Community Center.

Copies of the Plan were distributed by email to agencies within Clark County Continuum of Care, the Council for the Homeless, Northwest Justice

Project, Columbia Legal Services, Washington Department of Social and Health Services, Clark County, and the City of Vancouver.

A notice advertizing the public hearing on the Plan and the Plan's availability was advertized in *The Columbian*, the area newspaper, on August 5, 2009. Notice was published in the *Neighbor to Neighbor*, the newsletter for VHA public housing residents and HCV participants. Documentation of this advertizing is included in Appendix B.

The VHA Executive Director and staff met with representatives of Columbia Legal Services and the Northwest Justice Project on August 4, 2009 to answer questions and address concerns about the Plan.

During the public comment period an additional meeting was held with the Resident Advisory Committee to present the Plan, answer questions, and provide an opportunity for comments. That meeting occurred on August 11, 2009.

The VHA held a public hearing on September 3, 2009, at which time it received public comment. The two comments received are summarized in Table 11. The VHA received a number of written comments during the period prior to the hearing. These written comments are included in Appendix B and are also summarized in Table 11.

TABLE 11
SUMMARY RECORD OF PUBLIC COMMENTS AND VHA RESPONSE

INITIATIVE	SOURCE	COMMENT	RESPONSE
General comment	Letter from NWJ & CL	VHA has not analyzed how new MTW initiatives will impact ability to evaluate prior initiatives	VHA does not foresee any issues with the newly proposed initiatives impacting evaluation of previous initiatives.
General comment	Letter from NWJ & CL	VHA shuns control groups or outside evaluators	This is not correct. VHA has considered control groups for several initiatives, but rejected them due to the difficulty of implementing them in the housing setting. To do a random control group study properly would require VHA to control for as many factors as possible including tenant selection, family characteristics and turnover; which could lead to administrative burden and possible conflict with fair housing laws. VHA has, and will continue to welcome and cooperate with HUD contractors performing evaluations.

TABLE 11
SUMMARY RECORD OF PUBLIC COMMENTS AND VHA RESPONSE

INITIATIVE	SOURCE	COMMENT	RESPONSE
General comment	Letter from NWJ & CL	VHA does not publish funding and performance information	VHA publishes numerous plans and reports that contain such data, including financial and management reporting to our Board in open public meetings. MTW Annual Reports are published on the VHA website and include a great deal of funding and performance information.
General comment	Letter from NWJ & CL	VHA has not done comprehensive analysis of the impact of recent initiatives such as the single utility allowance	Most of the MTW initiatives, including the one referred to here, are just getting underway. Analysis and evaluation will continue to done and reported on in MTW Annual Reports
General comment	Letter from NWJ & CL	VHA should refocus on 1. Strengthening its current programs	VHA believes the proposed new initiatives are part of focusing and strengthening current programs. VHA has worked closely with partner agencies, particularly in the area of our work opportunities and campus of learners initiatives.
General comment	Letter from NWJ & CL	VHA should refocus on 2. Building meaningful partnerships with families and other agencies	Again, VHA's activities under MTW contribute to stronger partnerships. VHA continues to work closely with many partner agencies to increase the resources available for families in public housing and HCV programs. NWJ and CL have also participated in meetings with the VHA and community agencies.
General comment	Letter from NWJ & CL	VHA should refocus on 3. Evaluating impacts that previous proposals have had on program participants	VHA is focused on evaluation. The new requirements under the Amended and Restated Agreement will result in meaningful data collection and evaluation.
General comment	Letter from NWJ & CL	VHA should refocus on 4. Regularly publish key funding and performance information through use of a "dashboard"	The VHA is in the process of a computer conversion which will allow data to be more easily accessed. VHA staff are in the beginning stages of developing a dashboard type report that will be built incrementally over the next year.
Mandatory requirement for work-able adults	Letter from NWJ & CL	Does VHA have adequate funding for this?	Yes, the initiative can be undertaken by funding a single FTE to track tenant participation in eligible activities.
Mandatory requirement for work-able adults	Letter from NWJ & CL	HR 3288 has an amendment to defund community service.	The Bill is yet to become law and the amendment has been stripped out by the Senate.
Mandatory requirement for work-able adults	Letter from NWJ & CL	VHA was not able to provide intensive case management services in the past	This initiative will not require case management services and we are not proposing them. This initiative is not to be confused with the self-sufficiency programs which serve a subset of VHA residents.
Mandatory requirement for work-able adults	Letter from NWJ & CL	This will increase administrative burden when VHA has just adopted activities to reduce administrative burden	Not all activities under MTW meet the same goal. The VHA takes very seriously the goal of helping residents to achieve self-sufficiency and as such is willing to redirect savings from certain MTW activities toward those that encourage self-sufficiency.
Mandatory requirement for work-able adults	Letter from NWJ & CL	We question VHA's refusal to implement earned income disallowance and flat rents.	VHA is not aware of any "rigorous" evaluation demonstrating the efficacy of EID. We believe escrow offered under FSS to be a greater incentive. Flat rents as currently designed in Public Housing would allow for scarce subsidized units to be utilized by high income tenants rather than serving households with the greatest need.
Mandatory requirement for work-able adults	Letter from NWJ & CL	The unemployment rate in Clark County has surged and tenant will have difficulty securing employment and complying with community service requirements	VHA does not see a relationship between the high unemployment rate and availability of community service opportunities. In fact, the current economic situation may provide for more opportunities for service, leading to more employment opportunities when the economy improves. In addition community service is not the only choice, self-sufficiency and educational activities will also meet the 8 hour requirement.
Mandatory requirement for work-able adults	Letter from NWJ & CL	It is not clear to what extent the program comports with the Public Housing community services program	The MTW activity is basically an expansion of the public housing community service requirement to the HCV program. VHA will expand the program description in the Plan to clarify this.

TABLE 11
SUMMARY RECORD OF PUBLIC COMMENTS AND VHA RESPONSE

INITIATIVE	SOURCE	COMMENT	RESPONSE
Mandatory requirement for work-able adults	Letter from NWJ & CL	Full-time students, part-time students who also work part time, and TANF recipients should be exempt.	TANF recipients participating in a state administered welfare-to-work program are exempt. Education is considered a self-sufficiency activity and would count toward the 8 hours
Mandatory requirement for work-able adults	Letter from NWJ & CL	Tenants with children under age 13, or who would have out-of-pocket expenses should be exempt	The program allows that proving childcare is a “work activity”. This will allow for families with young children to participate either by providing childcare for others, or by utilizing such a service. In addition, households with school age children will be able to meet their responsibilities during school hours.
Mandatory requirement for work-able adults	Letter from NWJ & CL	The correlation between mandatory requirements and the benchmark is not clear	VHA respectfully disagrees. The statutory goal of incentivizing economic self-sufficiency and a benchmark of increased earned income seems clear.
Mandatory requirement for work-able adults	Letter from NWJ & CL	It’s not clear that a 10% increase in income outweighs a increase in administrative burden	VHA does not see the need to somehow balance the two statutory goals. In any case, a 10% increase in earned income would result in over \$300, 000 in saved housing assistance annually (enough to house 50 additional families).
Mandatory requirement for work-able adults	Letter from NWJ & CL	VHA should focus on expanding its FSS program instead	The VHA has expanded the FSS program and this initiative is designed in part to encourage even more participation in FSS. During 2009 VHA received funding for 2 additional FSS Service Coordinators and hope to receive additional Service Coordinator funding in 2010.
Mandatory requirement for work-able adults	Letter from NWJ & CL	VHA could work with community partners to create sustainable supportive services	This initiative, along with the Campus of Learners and other MTW initiatives, such as project based vouchers, does involve working with community partners to create additional supportive services. Many of the services provided by community partners are accessed by VHA residents.
Mandatory requirement for work-able adults	Letter from NWJ & CL	This program should only apply to those living in Public Housing	Both the VHA, and many of the tenants we serve, see the existing community service program as unfairly targeting public housing only. If the requirement has value, and VHA believes it does, shouldn’t it apply to all programs?
Mandatory requirement for work-able adults	Letter from NWJ & CL	VHA should follow the approach in the recently passed SEVRA, HR 3045 and exempt work requirements when unemployment is over 10%	This bill is not yet law and it is likely that the “HIP” attachment will change before final passage. In any case the commenter’s interpretation of the language from the SEVRA Bill appears to contradict the requirements for public housing in Section 12 of the 1937 Act. It is more likely that the language would not apply to community service or the VHA initiative as they include many eligible activities other than work.
Local preference for applicants without subsidized housing	Letter from NWJ & CL	VHA should not exclude a Public Housing tenant from seeking admission to the voucher program	VHA does not see this “protection” for public housing residents as being necessary in our community due to the high quality of our public housing. In addition, it will help facilitate the new site-based lists and allow VHA to serve needy families quickly rather than move other households from one subsidy to another.
Skyline Crest Campus of Learners	Letter from NWJ & CL	VHA should describe in greater detail the tenants’ and VHA’s roles and responsibilities	VHA is continuing to more fully develop this program and is working with a new formed Resident Council to implement the Campus of Learners, including additional detail about tenant and VHA roles and responsibilities. VHA believes the best way to develop resident ownership of the initiative is to involve resident from the beginning.
Skyline Crest Campus of Learners	Letter from NWJ & CL	Why doesn’t VHA simply allow families who demonstrate an inability to be successful to relocate?	To not hold tenants accountable will result in an ineffective program and send the message to tenants that we don’t think they are capable.
Skyline Crest Campus of Learners	Letter from NWJ & CL	Opt-out provision should be applied to all tenants.	Skyline will have its own waiting list so new applicants will be aware of the requirements for the housing they have applied for as opposed to in-place tenants who are being allowed to opt out because they did not originally apply for the program.

**TABLE 11
SUMMARY RECORD OF PUBLIC COMMENTS AND VHA RESPONSE**

INITIATIVE	SOURCE	COMMENT	RESPONSE
Mandatory requirement for work-able adults	Email from resident	Community service requirement should be changed from adults under age 62 to age 60	The VHA does not have authority to change to requirement for Public Housing and believes the requirement should be the consistent for the HCV program. A “documented physical problem” preventing full time work would likely be considered a disability exempting one from the requirement
Mandatory requirement for work-able adults	Public Hearing	I absolutely agree with this.	VHA appreciates the support. Particularly since it was expressed by a Housing Choice Voucher participant.
Medical deductions	Public Hearing	What if people do not have the money to pay their medical bills?	The MTW policy on medical deductions is already approved as part of the 2009 Plan and is not a new proposal for 2010.
General comment	Letter from 2 nd Step	We wholeheartedly applaud your effort to encourage clients to participate in an array of educational programs, economic incentives....	VHA appreciates the support from one of its community partners
Mandatory requirement for work-able adults	Email from DSHS	I would like to express my support for the 8 hour participation requirement...	VHA appreciates the support from one of its community partners
Mandatory requirement for work-able adults	Email from Council for the Homeless	Giving people opportunity to be actively involved in their own recovery from economic despair is empowering and builds self-esteem	VHA appreciates the support from one of its community partners
Mandatory requirement for work-able adults	Letter from Share	We hope that the VHA continues to invest time and energy into encouraging your residents to be active participants in the communities in which they live	VHA appreciates the support from one of its community partners
Project Based Vouchers	Letter from ACE	We applaud VHA for looking beyond its own portfolio and allowing this partnership to occur.	VHA appreciates the support from one of its community partners
General comment	Email from former resident	Contradiction on page 15 between inspections every 3 years and every 2 years	The every 3 year schedule on that page refers to reexamination not inspection. They are different activities with different schedules
General comment	Email from former resident	Reductions in medical allowances and utility allowances are a financial drain...	These activities were approved with an amendment to last year’s plan and are not under review at this time. In addition a hardship policy is available.

AGENCY DIRECTED EVALUATIONS OF THE MTW DEMONSTRATION

VHA has not directed any evaluations beyond those to be conducted and reported on in Section VII of the MTW Annual Report and the planned impact analysis and annual reevaluation of ongoing rent reform initiatives.

APPENDIX A
BOARD RESOLUTION & CERTIFICATION

HOUSING AUTHORITY OF THE CITY OF VANCOUVER

CLARK COUNTY WASHINGTON

RESOLUTION NO. 2842

**RESOLUTION TO APPROVE THE MOVING TO WORK ANNUAL PLAN
FOR FISCAL YEAR 2010**

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

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

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

WHEREAS, the Annual Plan for Fiscal Year 2010 has been prepared and made available for public comment for thirty days and a public hearing was held on September 3, 2009.

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

1. The Board of Commissioners approves the 2010 Moving to Work Annual Plan and authorized the Executive Director to complete the Plan documents and submit the Plan to the Department of Housing and Urban Development.
2. The Board of Commissioners certifies that the Public Hearing Requirement has been met and authorized the Chair of the Board to execute the attached Certifications of Compliance.

ADOPTED by the majority of members of the Board of Commissioners and signed by me in open session in authentication of its passage this 23th day of September, 2009.

ATTEST:



Roy A. Johnson, Secretary-Treasurer



Ronald K. Kawamoto, Chair

**Annual Moving to Work Plan
Certifications of Compliance**

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

**Certifications of Compliance with Regulations:
Board Resolution to Accompany the Annual Moving to Work Plan**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning January 1 2010, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA and conducted a public hearing to discuss the Plan and invited public comment.
2. The Agency took into consideration public and resident comment before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan;
3. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
4. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
5. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
6. The 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.
7. The 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
8. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
9. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
10. The 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.
11. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
12. The PHA will provide HUD or the responsible entity any documentation that the Department needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58.
13. With respect to public housing the 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.
14. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
15. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

16. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments.).

17. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.

18. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Vancouver Housing Authority
PHA Name

WA008
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)

Ronald K. Kawamoto
Name of Authorized Official

Chairman
Title


Signature


Date

APPENDIX B
PUBLIC PROCESS & PUBLIC COMMENTS

Affidavit of Publication

STATE OF WASHINGTON)

) ss:

County of Clark)

Columbian

FRANK .

VANC HOUSING AUTH/DEV DEPT-L

2500 MAIN ST

VANCOUVER WA 98660

REFERENCE: 71171 NOH MOVING WORK PLAN
3009318 Notice of Public Hea

I, the undersigned say,

That I am over the age of eighteen and not interested in the above entitled matter; that I am now, and at all time embraced in the publication herein mentioned, was, the principal clerk of the printer of The Columbian, a daily newspaper printed, published and circulated in the said county and adjudged a newspaper of general circulation by the Superior Court of the County of Clark, State of Washington, under Proceeding No. 802006715; that the advertisement, of which the annexed is a true printed copy, was published in the above-named newspaper on the following dates, to wit:

PUBLISHED ON: 08/05

TOTAL COST: 61.71

FILED ON: 08/05/09

Notice of Public Hearing
 The Vancouver Housing Authority (VHA) will hold a public hearing on its Moving to Work Annual Plan for 2010 on Thursday, September 3, 2009, at 6:00 p.m., in the VHA Community Room, 2500 Main Street. Comments from the public regarding the plan are welcome. Copies of the VHA 2010 Moving to Work Annual Plan will be available, beginning August 5, 2008, at the RISE & STARS Community Center, 500 Omaha Way, or at the VHA Main Street offices, 2500 Main Street. Copies will also be available on the VHA's web site, www.vhausa.com, in the "What's New" section.
Hearing Date: Wednesday, September 3, 2009
Time: 6:00 p.m.
Location: Community Room of the VHA Administration Office, 2500 Main Street, Vancouver, WA
 Vancouver Housing Authority
 2500 Main Street, Suite 200
 Vancouver, WA 98660-2697
Telephone: (360) 694-2501 or (503) 289-5593
Fax: (360) 993-9594
TDD: (360) 694-0842
 www.vhausa.com
 Equal Housing Opportunity
 Aug. 5 329530

I Certify (or declare) under penalty of perjury that the foregoing is true and correct.

Signature Judy Moody

Neighbor to Neighbor

Useful News from the Vancouver Housing Authority
and the Clark County Resident Council

September 2009
Volume 9 Issue 7

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| 3 | Activities for September |
| 3 | Resident Advisory Board |
| 4 | RISE & STARS Community Center Happenings |
| 4 | Play & Learn |

Vancouver Housing Authority
694-2501

RISE & STARS Community Center
737-2950

VHA Maintenance
694-4506

Visit VHA on the web @
www.vhausa.com

Your Opinion Counts! Notice of Public Hearing on VHA's 2010 Moving to Work Plan

The VHA is requesting your comments on the 2010 Moving to Work Plan. New VHA policies being proposed in the Plan include the following:

- New waiting list preference for those not already receiving housing assistance
- New waiting list preference for elderly, disabled and families with children
- New community service and/or training requirements for adults who are under age 62 and are not disabled and are working less than 25 hours per week
- The transformation of Skyline Crest into a Campus of Learners

You can see a copy of the Plan on the VHA website at www.vhausa.com and at the RISE & STARS Community Center (500 Omaha Way) or the VHA Main Street Office (2500 Main Street).

You can send written comments to David Overbay, Vancouver Housing Authority, 2500 Main Street, Vancouver, WA 98660. You can email your comments to doverbay@vhausa.com.

To comment in person and to hear others, please come to the public hearing:
Thursday, September 3rd, 2009 at 6:00 pm
Vancouver Housing Authority, 2500 Main Street

Quit Smoking and Notice the Benefits Right Away

Your body begins to heal immediately after smoking your last cigarette.

- In 20 minutes your blood pressure drops and returns to normal. Your body temperature rises, especially in your hands and feet.
- In 8 hours your body's oxygen rises to normal levels and carbon dioxide levels drop to normal.
- In 48 hours your sense of taste and smell improve and your nerve endings begin to re-grow.
- In 2 weeks-3 months your circulation improves and lung function increases.
- In 1 year your risk of heart disease drops by 50%.
- In 5 years your stroke risk is reduced to that of a person who never smoked.
- In 10 years your risk of getting lung cancer drops by 50%. Your risk of heart disease is the same as a non-smoker.

Even if you've tried quitting several times, or quit and then relapsed, you can be successful. Quitting smoking is the single most important thing you can do for your health and your family's health.

For free help, call the Washington Tobacco Quit Line, **1.800.QUIT NOW (784.8669)**, or go to www.QUITLINE.com



Please Sign In

Vancouver Housing Authority Public Hearing on the 2010 MTW Annual Plan

Thursday, September 3, 2009
2500 Main Street
Vancouver, WA 98660

Name	Organization
1. <i>Yvonne Stodars</i>	<i>C. House</i>
2. <i>Brenda Hansen</i>	<i>C. House</i>
3. <i>Rick Crowder</i>	
4. <i>AMY BRIDGEMAN</i>	
5. <i>Amy McCullough</i>	<i>NJA</i>
6. <i>Leahy</i>	
7. <i>Diana Jackson</i>	
8. <i>Courtney Foreman</i>	
9. _____	
10. _____	
11. <i>Lavon Hodder</i>	
12. <i>Sasha Nicholson</i>	
13. <i>Connie Sherrard</i>	
14. <i>David Overberg</i>	
15. <i>Roy Johnson</i>	
16. <i>Jan Wickert</i>	



August 28, 2009

Roy Johnson
Executive Director
Vancouver Housing Authority
2500 Main Street
Vancouver, WA 98660

Re: Comments on Moving to Work Annual Plan for FY 2010

Dear Mr. Johnson,

We write to express our joint comments regarding Vancouver Housing Authority's (VHA) draft Moving to Work Annual Plan for FY 2010. We ask VHA not to move forward with certain of the proposed changes as discussed below.

Our comments are based on the information provided to us during our recent meeting with you and other VHA senior management and from the draft Annual Plan. Before discussing our comments we feel compelled to reiterate previous concerns that continue to be relevant to whether VHA should move forward with programmatic changes of the magnitude it proposes here. These concerns include:

- VHA's annual embarkment on a number of new MTW initiatives without analyzing how such efforts will impact its ability to rigorously evaluate the success or failure of its prior initiatives.
- VHA's decision not to design and implement its various MTW initiatives in a manner that would allow them to be adequately evaluated so that results from these initiatives could be used by HUD and Congress to redesign our Public Housing and Section 8 Voucher programs nationwide. For example, VHA continues to shun the use of any control groups or an outside, independent evaluation of its initiatives. Furthermore, VHA has not been publishing funding and performance measurement information for review by and input from community stakeholders and program participants.
- VHA's lack of comprehensive analysis regarding the impact its various MTW initiatives have had on the housing opportunities of its public housing and Section 8 voucher households. VHA has recently adopted a number of policies, such as a single utility allowance that varies solely by bedroom size, which will limit the dwelling units that tenants can afford to rent. As a consequence, in the coming months many tenants face

Roy Johnson—Letter
Re: Comments on Moving to Work Annual Plan for FY 2010
August 28, 2009
Page 2

increased shelter costs and may have to move. What impact will those and these proposed changes have?

In light of these concerns, we are asking VHA to refrain from implementing several of the changes outlined in its Annual Plan until its most recent changes to its Section 8 voucher and public housing programs have been in place long enough for VHA to evaluate the efficacy, benefits, and costs of the those changes. Rather than continuing to implement major, new MTW initiatives each year, VHA should refocus its efforts on (1) strengthening its current programs; (2) building meaningful partnerships with the families it currently serves and with other agencies serving extremely low-income households in need of housing assistance; (3) evaluating the impacts that its previous proposals have had on program participants and the community at large; and (4) regularly publishing key funding and performance measurement information on its website through the use of a “dashboard” or other reporting device.

1. Mandatory Requirements for Work-Able Adults

We have a number of concerns with VHA’s proposal to establish mandatory community service requirements for “work-able” Section 8 voucher participants and all adult members of their households. Specifically, we are concerned about: 1) adequate administrative support and funding to maintain the program; 2) availability of community service opportunities in Clark County; 3) lack of information regarding the scope of allowable community service activities and VHA’s efforts to help tenants succeed; 4) out-of-pocket expenses for families leading to non-compliance and loss of housing assistance; 5) potential increase in Section 8 terminations and evictions due to the punitive nature of the proposal; and 6) the lack of cost/benefit analysis and consideration of other less punitive alternatives that might achieve VHA’s stated objective of assisting families in achieving self-sufficiency.

a. Administration and Funding

We question whether VHA will receive adequate funding to maintain this program or will have sufficient case management services to make the program a success. We also question why VHA proposes to undertake a program that will undoubtedly increase its administrative burden, which runs counter to its MTW objective of achieving administrative efficiency.

When HUD first proposed implementing community services requirements for public housing tenants, most public housing authorities, including VHA, questioned the value of imposing such a requirement, given the administrative burden of operating such a program without any additional financial assistance from HUD. Both public housing agencies and residents opposed the requirement as burdensome and intrusive.

Just recently, on July 23, 2009, the United States House of Representatives passed H.R. 3288, the Transportation, Housing and Urban Development, and Related Agencies FY10 Appropriations bill, thereby adopting an amendment that will prohibit the use of funds provided in the bill to enforce the public housing community services requirements. Given this latest

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legislative development, we are surprised to see that VHA's thinking has changed and it is now proposing to expand this burdensome and intrusive community services requirement to the Section 8 voucher program.

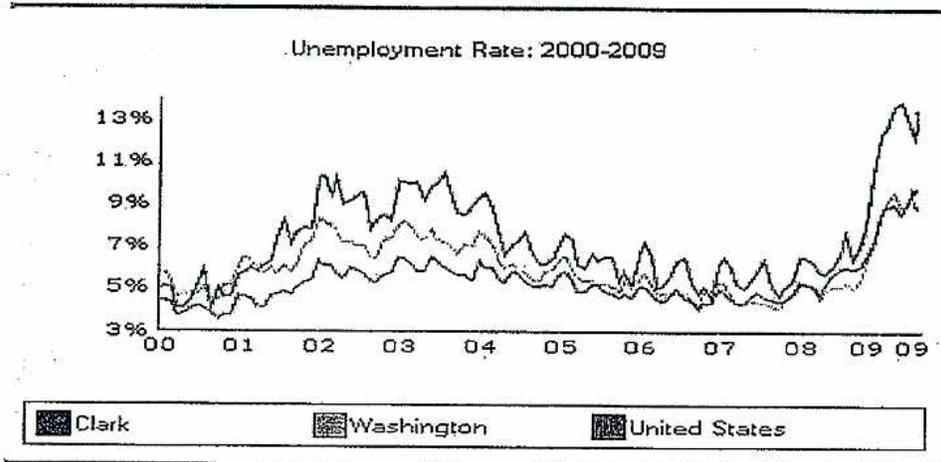
Regarding case management services, it seems that VHA may have forgotten the lessons it learned during the first five years of its participation in the MTW program. When VHA first was approved to be an MTW jurisdiction, it required both its public housing and Section 8 voucher families to sign mandatory self-sufficiency MTW Contracts with five-year time limits. At the time, VHA promised to provide intensive case management and to link families with the support services they needed to move towards self-sufficiency. For the most part, VHA was not able to provide the case management promised or link families with the services they needed, and eventually the program was terminated. Only recently, after HUD informed VHA that it could not waive the public housing community services requirement, did VHA reinstitute that requirement in its Public housing program. We are still waiting to see how well public housing tenants fare under that change. Given this, it seems premature to expand this requirement to the much larger Section 8 voucher program, particularly without a commitment from VHA to increase its case management services.

We are further perplexed by VHA's decision to adopt a program that will increase its administrative burden when just recently VHA chose to eliminate medical expense deductions for elderly and disabled families--despite the inherent risk of financial harm to numerous families—based on its stated objective to reduce its administrative burden. We believe that adopting an administratively burdensome program with little or no evidence of likely success, on the heels of jettisoning a longstanding rent deduction benefiting elderly and disabled families in the name of administrative efficiency, is a step in the wrong direction.

Rather than mandating community service, we would prefer to see VHA provide public housing tenants and Section 8 Voucher participants with financial incentives that will reward them for working or moving towards self-sufficiency. In this regard, we continue to question the agency's refusal to implement the mandatory earned income disregard and flat rents in its public housing program which are required nationwide. We would like to see VHA provide public housing tenants and Section 8 Voucher participants with comparable financial incentives designed to reward work.

b. Community Service Opportunities

We question whether there are, or will be in the near future, sufficient employment and community service opportunities of a meaningful nature in our area to sustain a program tying basic shelter to work/volunteer activities. As the following chart illustrates, in recent months Clark County's unemployment rate has surged and, currently, is hovering near 14 percent (13.7 percent as of July 2009).



Source: Washington State Employment Security Department, Labor Market and Economic Analysis. For more information, see:
https://fortress.wa.gov/esd/lmea/countydashboard/URateDetails.aspx?area=53_04_000011&qtype=1&comp=True&area2=53_01_000000&area3=00_00_000000#

Because of this extraordinarily high unemployment rate, employers can afford to be very selective in hiring employees, in turn making it difficult for job seekers with limited education, experience and transferrable skills to be competitive in the job market. Consequently, unless the economic forecast makes a dramatic positive upswing soon, VHA's proposal likely will set many families up to fail. Some tenants, despite their best efforts, will not be able to secure employment or comply with the community service requirements, leading to unnecessary voucher terminations, evictions, and increased homelessness and family instability. Furthermore, VHA's stated benchmark of a 10 percent increase in average earned income after two years will not be realized.

c. Lack of Information Regarding Scope, Feasibility and Reasonableness.

HUD defines an economic self-sufficiency program as:

Any program designed to encourage, assist, train, or facilitate the economic independence of HUD-assisted families or to provide work for such families. These programs include programs for job training, employment counseling, work placement, basic skills training, education, English proficiency, workfare, financial or household management, apprenticeship, and any program necessary to ready a participant for work (including a substance abuse or mental health treatment program), or other work activities.

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24 C.F.R. §5.603. It is not clear to what extent VHA's proposed program comports with HUD's definition or its current public housing community services program policy, nor whether its community service activities include the variety of opportunities directly related to assisting families in becoming self-sufficient, as suggested by 24 CFR §5.603. Consequently, we ask that VHA define community service activities to incorporate all of the allowable self-sufficiency activities enumerated in the above HUD definition and in VHA's public housing community service program.

VHA's proposal presumes that individuals working fewer than 25 hours per week are not striving toward self-sufficiency or adequately contributing to society. According to the proposal, any adult household member who is less than 62 years old, works fewer than 25 hours per week, and is not disabled or caring for a disabled family member will have to complete 96 hours of community service per year. This means that full-time students, individuals going to school part-time and working part-time (e.g., 24 hours per week), or parents participating in TANF's WorkFirst program will also have to engage in community services activities.¹ It is hard to imagine, however, that one could reasonably consider these individuals not to be striving towards self-sufficiency and therefore subject to additional work/volunteer requirements to keep their housing.

We question whether it is reasonable to strip a family of its housing because its 18 year-old son or daughter, for example, lives at home, attends college (either full-time or part-time while working part-time), but does not complete 96 hours of community service requirements. We also question whether it is reasonable to require a parent of children younger than 13 to have to pay for day care, transportation, and other associated costs to "volunteer" when that volunteer activity may not open any doors of economic opportunity. Or worse yet, whether it is appropriate to place families in the unfortunate position of not being able to afford to comply with these community service requirements because they cannot afford to pay for day care, gas, car repairs or insurance, bus fare, etc.

We ask VHA to exempt from community service requirements all household members who are full-time students, part-time students who also work, TANF recipients participating in a WorkFirst program, or a parent caring for children younger than 13. Most of these exemptions are already available to VHA's public housing tenants under its current public housing community services program and should be available to Section 8 voucher participants as well. Finally, we ask VHA to consider implementing a hardship or waiver provision for those families who can demonstrate that their out-of-pocket costs, e.g., day care or transportation, make it cost-prohibitive to engage in community service activities.

¹ VHA has indicated that Heads of Household who receive TANF or are full-time students will be exempt from these community service requirements. Its published proposal, however, does not reflect this.

d. Lack of Costs/Benefits/Feasibility Analysis and Consideration of Alternatives

VHA has not demonstrated that it engaged in a comprehensive analysis of the costs/benefits, impact, or feasibility of this proposal² or considered other less costly, less punitive, but equally or more effective, alternatives directly correlated to achievement of economic self-sufficiency.

It is not clear that there is a direct correlation between *mandatory* community service requirements and VHA's stated benchmark. It is equally unclear that the anticipated benefits of this proposal, a 10 percent increase in average household income over two years, outweighs a substantial increase in administrative burden.

Unemployment may be attributed to any number of underlying factors, including lack of transferrable skills, education and/or experience, unreliable transportation, lack of affordable day care, bad credit or criminal records, and lack of affordable health care; not to mention a failing local economy. VHA's proposal does not appear to be directly tailored to address the root causes of unemployment or to meaningfully encourage or assist participants in overcoming those barriers. Rather, VHA's proposal appears to be punitive in nature, making tenants engage in an artificial number of community service hours, regardless of whether those hours will actually lead to employability or employment, for the sake of keeping basic shelter.

Rather than tying basic shelter to mandatory community service activities in such a bad economy, VHA should focus its efforts on expanding its Family Self-Sufficiency (FSS) program and on linking its tenants with existing programs in the community that might assist them in becoming gainfully employed. Where such programs are not available, VHA resources would be better spent designing and implementing such programs, rather than monitoring compliance with community service requirements and processing terminations of vouchers for non-compliance.

For example, VHA could work with community partners to create sustainable supportive services tailored to assist tenants in developing job and life skills that will actually enable them to secure a living-wage job, balance a budget, and eventually transition out of subsidized housing. Budgeting, finance, credit counseling, computer skills, resume building and interview workshops, literacy programs, and substance abuse treatment programs, for example, are much more likely to elevate one's chances of securing employment and long-term financial independence than requiring a tenant to do eight hours of unpaid work s/he already knows how to do or volunteering at a local church or doing yard work for VHA, for example.

Due to the lingering questions regarding the proposal's purpose, scope, and feasibility we ask VHA not to move forward with the proposal as drafted. To the extent that VHA does move forward on this proposal, it should make sure that this program is consistent with the HUD requirements governing the public housing community service program set forth in 24 C.F.R. 960, Subpart F. In particular, this program should only apply to those families who, if living in

² To adequately assess the potential viability of this plan, VHA should consider the cumulative effect of past and proposed changes, including reduced utility allowances, occupancy standards, community service requirements for public housing residents, and loss of medical expense deductions.

public housing, would be required to engage in community service. Most importantly, families should be allowed to satisfy the community service requirement by engaging in all of the activities permitted under the public housing program.

To the extent that VHA deems it necessary to make community service requirements mandatory, it should consider as a consequence for non-compliance a reduction in housing subsidy rather than total loss of housing assistance. We also ask VHA to follow the approach set forth in the most recently passed version of SEVRA, which prohibits enforcement of mandatory forced-work requirements whenever the local unemployment rate exceeds 10 percent. See Amendment to H.R. 3045, dated July 22, 2009, attached hereto.

2. Local Preference for Applicants Without Subsidized Housing

We believe the proposed local preference for applicants without subsidized housing unfairly deprives current public housing participants of housing opportunities, contrary to the MTW objective of increasing housing choice. VHA has not demonstrated a compelling reason to waive the provisions of 42 U.S.C. 1437f(s) and 24 C.F.R. 982.207(a)(4) that prohibit a PHA from denying a local preference or otherwise excluding or penalizing a family seeking admission to the Section 8 voucher program, solely because the family resides in public housing. Clearly, there are situations where tenants in public housing would benefit from being transferred to the Section 8 voucher program. For example, such a family may wish to use a voucher to secure more suitable housing or to locate closer to educational or employment opportunities. In our view, public housing tenants who have demonstrated their ability to be good tenants should not be permanently warehoused simply because they are already in public housing and it is more convenient to VHA to leave them there. Moreover, allowing public housing tenants, who are already on a wait list for a voucher, first refusal for a voucher does not mean that wait-listed applicants will not receive housing assistance.

3. Skyline Crest Campus of Learners

VHA's proposal does not provide sufficient detail regarding family responsibilities or the correlation between a participant's child's education to the participant's ability to be economically self-sufficient to elicit meaningful public comment. Given the potential loss of housing assistance for failure to comply with the proposed program's requirements, VHA should describe in greater detail tenants' and VHA's roles and responsibilities, the program's benefit and feasibility, as well as impact on participants and applicants.

From the proposal's current description, a participating family's responsibilities appear to be overly broad and not narrowly tailored to achieve VHA's stated objective. It also appears that families are exposed to the potential loss of shelter based on the actions or inactions of children. We are concerned about the undue pressure this inevitably will place on children to be responsible for their family's shelter. Additionally, VHA has indicated that parents will be expected to "deal with truancy" issues, but has not made clear just what efforts a parent must take in this regard to avoid loss of housing for his/her entire family. What happens when a

Roy Johnson—Letter
Re: Comments on Moving to Work Annual Plan for FY 2010
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teenager, despite a parent's reasonable efforts, refuses to attend school and drops out? Does the entire family become homeless as a result?

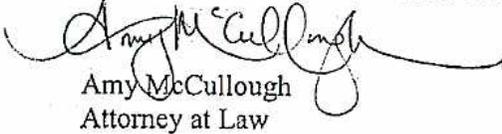
Furthermore, the proposal does not advance a compelling reason for making this pilot project mandatory, rather than voluntary, nor why a family should lose its housing assistance if it cannot meet all the requirements of its Family Success Plan. If this is intended to be a pilot project to test the relationship among education, good parenting and economic success, why doesn't VHA simply allow families who demonstrate an inability to be successful at Skyline Crest to relocate to another location?

Finally, VHA proposes that current tenants at Skyline will have the option of exiting the program after one year, but that new tenants (wait-listed applicants) will not. VHA's decision to deprive new tenants of an opt-out opportunity following a year trial period seems unfair. We ask VHA to apply the opt-out provision to all tenants equitably.

Thank you in advance for your consideration of our comments.

Sincerely,

NORTHWEST JUSTICE PROJECT



Amy McCullough
Attorney at Law

COLUMBIA LEGAL SERVICES



Gregory D. Provenzano
Attorney at Law

David Overbay

From: wayne M myhre [waykoala7@yahoo.com]
Sent: Wednesday, September 02, 2009 11:27 AM
To: David Overbay
Subject: move to work plan

Request: the community service requirement proposed for "adults under 62 and are not disabled and are working less than 25 hours a week" should be revised to say "adults under 60" or "without functional limitations" I am 60 and not disabled, though i have documented physical problems that prevent me from full time work, and I currently work less than 25 hours a week. Thankyou,

Wayne

Second Step

H O U S I N G

2500 Main Street, Suite 120, Vancouver, WA 98660 • MAIN: 360-993-5301 • FAX: 360-993-5304

www.secondstephousing.org

September 1, 2009

Mr. Roy Johnson
Vancouver Housing Authority
2500 Main Street
Vancouver, WA 98660

RE: Moving to Work Annual Plan for 2010

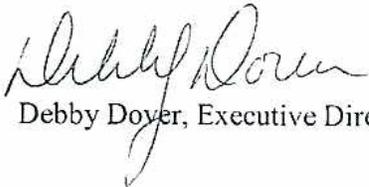
Dear Roy,

Second Step Housing is very pleased to support the 2010 MTW Plan. We wholeheartedly applaud your effort to encourage your clients to participate in the array of educational programs, economic incentives and ongoing support that are necessary to effectively help families move toward genuine self-sufficiency.

We also appreciate the opportunity to include your clients in the tenant education and life skills programs we offer to the community.

When families are able to afford their own housing, it serves them, our community and makes more resources available to offer housing to more people. Our hope is that the project-based Sec. 8 program can expand and we can continue to work together to support the success of those who need our help.

Sincerely,



Debby Doyer, Executive Director

David Overbay

From: LaVon Holden
Sent: Thursday, September 03, 2009 2:16 PM
To: David Overbay; Roy A. Johnson
Subject: Fw: MTW Plan

FYI

----- Original Message -----

From: Juhola, Kirby (DSHS) <JuholKT@dshs.wa.gov>
To: LaVon Holden
Sent: Thu Sep 03 12:11:32 2009
Subject: MTW Plan

I would like to express my support for the eight hour participation requirement outlined in the plan. All activities that support a participant being connected to the benefits that they receive is constructive. In addition, required activities build skills, self-esteem, and a positive connection to the community. The plan as proposed clearly enhances participant involvement in their home and offers an opportunity to develop skills and abilities that will lead to better employment opportunities and self-sufficiency.

From: Craig Lyons
Sent: Friday, September 04, 2009 2:59 PM
To: LaVon Holden
Subject: MTW

Hi LaVon,

With regards to the MTW plan overall, from what I have reviewed thus far, I feel it looks good.

It is clear throughout that your intent is to give people opportunity, and encourage families to take ownership for their own recovery, as is considered best-practice by providers of recovery-based programs. There is no intent to set people up for failure.

Giving people opportunity to actively be involved in their own recovery from economic despair is empowering and builds self-esteem. As you know I am a long-time proponent of engaging people utilizing public assistance in actively 'giving back' to the community that is offering an opportunity to regain independence. This is not asking people to work, but to be engaged in recovery.

Best practices I am familiar with allow any 'hours of productivity' to be counted as getting engaged. These could include job search with a professional job coach, mental health counseling, asset building activities like money management classes, etc. Our community has a large capacity to offer these opportunities and the means to access them. We have coalitions that focus on the development of more of these opportunities and if we find that there is a burden to this process of engagement that is unreasonable, we can build alternatives or in extreme cases review for hardship.

When done well, administration of this type of program should be simple. One example of a tool I've seen used is a 'productivity timesheet' that is completed by the participant and signed by partner organization staff. It is similar to a work timesheet that describes very briefly the productive activity and is signed by the professional staff with whom the work was completed. Tenants submit that sheet to verify effort.

It is unclear how this proposal is burdensome or intrusive on residents as these activities would be expected from anyone making efforts to work toward self-sufficiency. These requirements would only be burdensome to someone avoiding personal responsibility to be self-reliant.

Consequences for non-compliance is the crux. Losing housing for lack of effort is not necessarily the answer to an engrained and self-perpetuating culture of poverty. Creating incentives is the better resolve but how to administer that would be a challenge. I would recommend that if the proposal is to create a program that is incentive-based instead of consequence driven that a workgroup be developed to look at how that could be managed with minimal administrative burden or need for additional case management.

Thank you for giving us the opportunity to be involved in this public process of MTW plan development.

Craig

Craig Lyons, Executive Director
Council for the Homeless
2500 Main St.
Vancouver, WA 98660
360-993-9570
www.icfth.com



September 3, 2009

Dear Ms. LaVon Holden:

This letter is written in response to your request for comments from Share in regards to the Moving to Work requirement of 8 volunteer hours per month for able bodied residents. As an agency Share believes in the value of clients working either for pay or in a volunteer capacity. We believe that meaningful work can have a positive effect on a person's mental health, and give people a reason to face the day and be a part of something larger than themselves. Once they are no longer in crisis we have tried numerous ways to engage our clients in activities including volunteering for other agencies.

For some participants this has meant that they not only had an opportunity to contribute to the community where they reside, but have resulted in references for future jobs. For other clients we have learned that the sense of requirement diminishes their view of this opportunity as meaningful or pleasant.

We strongly encourage people who are able bodied and not in crisis to be involved in activities that enrich their lives and volunteering is certainly one of the means to achieve that sense of value. As an agency that is backed by more than 8,000 volunteers we could not offer our services without volunteers of all income brackets who give of their time and energy.

People living in poverty who volunteer offer adverse and important opinions, they by the fact of their giving help others to see the privileges that they have in their lives. We hope that the Vancouver Housing Authority continues to invest time and energy into encouraging your residents to be active participants in the communities in which they live.

Sincerely,

Amy Reynolds
Director of Programs
Share



September 3, 2009

David Overbay, Federal Program Policy Manager
Vancouver Housing Authority
2500 Main Street
Vancouver, WA 98663

Dear David,

Thank you for the opportunity to comment on the Vancouver Housing Authority's Move-To-Work Annual Plan.

Affordable Community Environments is very excited about our partnership in using project-based vouchers to better serve high need families and residents with disabilities. We are currently working with VHA on two of our existing projects, and look forward to identifying additional opportunities to partner in our new McCallister Village project.

By working together to target key rental subsidy resources to units with services and case management requirements, we will be better able to serve our high need residents, but also help them move towards greater self-sufficiency.

We applaud VHA for looking beyond its own portfolio and allowing this partnership to occur.

Sincerely,

Leah Greenwood
Executive Director

David Overbay

From: Steve Towell
Sent: Friday, September 04, 2009 8:30 AM
To: Roy A. Johnson; David Overbay
Subject: FW: 2010 MTW Plan Comments

The 2010 MTW message below was received via our web site.

Steve Towell
Community Relations
Vancouver Housing Authority
(360) 993-9563
stowell@vhausa.com

From: Corinne Klosinski [mailto:corinnejr@q.com]
Sent: Thursday, September 03, 2009 7:55 PM
To: webmaster
Cc: conway300@dsha.wa.gov
Subject: 2010 MTW Plan Comments

Pages 15-17 carry a number of contradictions and cuts to the people who can afford them the least; namely the Elderly and Families on FIXED incomes. Direct contradictions to the VHA Mission Statement; especially where protecting tenant dignity and the public trust, are concerned. I am on both Sect. 8 and the Public Housing Waitlists. These contradictions and decreased financial help to those most vulnerable, who literally can NOT afford to lose any more assistance, is at best without concious. At the very least, absolutely without scruples.

Ex: Bottom of Pg. 15, left column, it states that the Elderly and Disables Familiie on FIXED incomes will have inspections only once every 3 years. Now go to, same page, bottom right column. It states that the HCV(Sect.8), people will have inspections every 2 years, BUT with a land-lord inspetion in the interum. Direct contradiction, since many of these same 'Elderly and Disabled Families on FIXED incomes', are HCV aka: Section 8.

In pages 16-17, these intended financial drains on those who can LEAST afford it continues in the reductions of medical allowances and utility allowances.

These Elderly and Disabled Families on FIXED incomes, well most of us are the ones who worked, HARD for 35, 40 or more, years. Paying all manners of the taxes that float the programs to help, not hinder, those of us who are now either: Elderly or Disabled on FIXED incomes. We broke our backs to work and pay taxes, which fund the Federal Allowance Monies and the Federal Grants, so that now this Housing Authority can short-sheet us on benifits. ????

This goes against: EVERYTHING THAT THESE UNITED STATES OF AMERICA, EVER STOOD FOR, EVER FOUGHT FOR, AND EVERY INALIENABLE RIGHT THAT IS NOW PART OF OUR CONSTITUTION. PERIOD !!!!!

I was part of the RAB. I am not the only one who rememers R. Johnson stating that in the 2010 'Move To Work Plan', that there would be a qualifier stating that because, 'Elderly and Disabled Families on FIXED incomes', people who are no longer, nor will they ever be ABLE TO GO BACK TO WORK, are **excluded** from all the regulations, changes, etc.,etc., listed in the MOVE TO WORK Plan. BECAUSE THEY ARE NO LONGER PART OF THE WORK FORCE, NOR CAN THEY EVER BE PART OF THE WORK FORCE.

So what happened to that promise made to the RAB ?? Especially since these new underminings in the 2010 MTW Plan directly affect, MOST NEGATIVELY, most of the RAB, and the people they represent?????

This is my comment on the 2010 MTW Plan.
Corinne Klosinski

David Overbay

From: Steve Towell
Sent: Friday, September 04, 2009 8:31 AM
To: Roy A. Johnson; David Overbay
Subject: FW: 2010 MTW Plan: Pgs.15-17 Comments

The 2010 MTW message below was received via our web site.

Steve Towell
Community Relations
Vancouver Housing Authority
(360) 993-9563
stowell@vhausa.com

From: Corinne Klosinski [mailto:corinnejr@q.com]
Sent: Thursday, September 03, 2009 8:14 PM
To: webmaster
Subject: 2010 MTW Plan: Pgs.15-17 Comments

This section is riddled with contradictions. 1 ex:Inspections
Bottom left column of Pg.15, states that the Elderly and the
Disabled families on FIXED incomes will go to inspections
once every 3 yrs. Same page, bottom right column states that all HCV people will have inspections every other year,
with landlord inspection in the meanwhile.(not exact quote)
Well, HCV includes all those elderly and disabled families on fixed incomes on Sect.8, since HCV & Sect.8 mean the
same thing.

This also carries onto reduced medical deduction for the
elderly and families on FIXED incomes, and the reduced
utility allowance for these same FIXED income, struggling
people.

The VHA Mission Statement: "in an enviroment which
preserves personal dignity and in a manner which **maintains the public trust**.

Well, I am on both the Sect.8 and Public Housing Wait
Lists. AND I am a disabled person on a FIXED income. The
way these thing read in pages 15-17, as a potential future
tenant, this all scares me to death.

The biggest share of the VHA's income is from Fed.Funds and Grants,(more federal money), so why is this
same VHA, in later paragraphs, trying to reduce us to choosing between healthy meals and dog food. Between the
medical reduction, and the utility reduction, this translates into 12-15 MEALS a month, you now seem to think,we can
do without, physically, mentally and emotionally. If you would not want this done to you, why are you breeching every
moral ethic that this country has stood and fought for. bringing multiple financial hardships on those of us who can least
afford them. ?????

Please see my other comment on this trilogy of horrors
you seek to do to those of us who for many decades worked
hard, and paid the taxes to fund these programs.

According to the VHA Mission Statement, the VHA is
dedicated to 'personal dignity and public trust' . This mission statement is completely contradicted by pages 15-
17. This MTW is at best a horror show for those of us you are suppose to be dedicated to protect. Corinne Klosinski
Save this copy as well, in my files.

suppon
to increase our income.

APPENDIX C

ADVISORY COMMITTEES

RESIDENT ADVISORY BOARD

Sara Angelo

Yvonne Broders

Jacinta Cox

Michael Ralston

Billie Reed

Trisha Rice

Rebecca Smith

Amy Bradseth

Julie Ensign

Debra Conway

Chris Pazen

Brenda Hansen

MOVING TO WORK ADVISORY COMMITTEE

Jordana Barkley	SW Washington Workforce Development Council
Sierk Braam	Board Member, Council for the Homeless
Pam Brokaw	SW Washington Partners in Careers
Debra Conway	VHA Resident Commissioner
Debby Dover	Second Step Housing
Karen Evans	Clark County
Trina King	Columbia River Mental Health Services
Kirby Juhola	Washington State Dept. of Social and Health Services
Craig Lyons	Council for the Homeless
Amy McCullough	Northwest Justice Project
Bridget McLeman	Children's Home Society of Washington
Becky Merritt	Clark College
Klaus Micheel	Washington State Dept. of Social and Health Services
Pete Munroe	Clark County
Greg Provenzano	Columbia Legal Services
Amy Reynolds	Share
Trisha Rice	VHA Participant
Peggy Sheehan	City of Vancouver
Sharon Wylie	Board Member, Council for the Homeless

APPENDIX D

FIVE-YEAR CAPITAL PLAN

**FIVE YEAR CAPITAL PLAN
2010-2014**

2010		
<u>Community</u>	<u>Planned Activity</u>	<u>Budget</u>
Skyline Crest	Moderate Rehabilitation	450,000.00
Scattered Sites	Weatherization & Interior Upgrades	200,000.00
Public Housing	Development Activities	200,000.00
VHA Wide	Capital Program Administration & Community Center Program	160,000.00
	TOTAL	1,010,000.00

2011		
<u>Community</u>	<u>Planned Activity</u>	<u>Budget</u>
VHA Wide	Capital Repayment Fund	235,000.00
VHA Wide	Capital Program Administration and Community Center Program	170,000.00
Scattered Sites	Comp Mod	200,000.00
Scattered Sites	Exterior Upgrades	100,000.00
	TOTAL	705,000.00

2012		
<u>Community</u>	<u>Planned Activity</u>	<u>Budget</u>
VHA Wide	Capital Repayment Fund	235,000.00
VHA Wide	Capital Program Administration and Community Center Program	170,000.00
Scattered Sites	Cabinet and Fixtures Replacement	300,000.00
Skyline Crest	New Doors and Jambs,	100,000.00
	TOTAL	805,000.00

2013		
<u>Community</u>	<u>Planned Activity</u>	<u>Budget</u>
VHA Wide	Capital Repayment Fund	235,000.00
VHA Wide	Capital Program Administration and Community Center Program	170,000.00
Skyline	Cabinet Replacement	600,000.00
	TOTAL	1,005,000.00

2014		
<u>Community</u>	<u>Planned Activity</u>	<u>Budget</u>
VHA Wide	Capital Repayment Fund	235,000.00
VHA Wide	Capital Program Administration and Community Center Program	170,000.00
Van Vista Plaza	Seismic Upgrade	500,000.00
	TOTAL	905,000.00

APPENDIX E

GLOSSARY

ACC Annual Contributions Contract

ACOP Admissions and Continued Occupancy Policy for the Public Housing Program

Adjusted Income Annual income, less allowable HUD deductions

Administrative Plan The plan that describes PHA policies for administration of the tenant-based programs. The Administrative Plan and any revisions must be approved by the PHA's board and included as a supporting document to the PHA Plan.

AMP Asset Management Property

Annual Contributions Contract (ACC) The written contract between HUD and a PHA under which HUD agrees to provide funding for a program under the 1937 Act, and the PHA agrees to comply with HUD requirements for the program.

Annual Income The anticipated total income of an eligible family from all sources for the 12-month period following the date of determination of income, computed in accordance with the regulations.

ARRA American Recovery and Reinvestment Act of 2009

CFRC Capital Fund Recover Competition grant, part of the American Recovery and Reinvestment Act of 2009

CLT Community Land Trust

Disability See Person with Disabilities

Disabled Family A family whose head, spouse, or sole member is a person with disabilities. It may include two or more persons with disabilities living together, or one or more persons with disabilities living with one or more live-in aides.

EIV Enterprise Income Verification, HUD's online data system for verification of family income.

Elderly Family A family whose head, spouse, or sole member is age 62 or older.

Extremely Low Income Family A family whose annual income does not exceed 30 percent of the median income for the area, as determined by HUD,

with adjustments for smaller and larger families. HUD may establish income ceilings higher or lower than 30 percent of median income if HUD finds such variations are necessary due to unusually high or low family incomes.

Fair Market Rent (FMR) The rent, including the cost of utilities (except telephone), as established by HUD for units of varying sizes (by number of bedrooms), that must be paid in the housing market area to rent privately owned, existing, decent, safe and sanitary rental housing of modest (non-luxury) nature with suitable amenities.

Family Self-Sufficiency (FSS) The program established by a PHA to promote self-sufficiency of assisted families, including the coordination of supportive services.

Family Success Plan (FSP) A plan developed by the family for educational attainment and community involvement

FMR Fair market rent

FSP Family Success Plan

FSS The Family Self-Sufficiency program

FY Fiscal year

GAAP Generally Accepted Accounting Principles

HAP Housing assistance payment

HCV Housing choice voucher, also see Voucher.

HOH Head of Household

HOPWA Housing Opportunities for Persons with Aids

Housing Assistance Payment (HAP) The monthly assistance payment by a PHA, this includes: (1) A payment to the owner for rent to the owner under the family's lease; and (2) An additional payment to the family if the total assistance payment exceeds the rent to owner

Housing Agency (HA) A State, county, municipality or other governmental entity or public body (or agency or instrumentality thereof) authorized to engage in or assist in the development or operation of

low-income housing. (“PHA” and “HA” mean the same thing.)

Housing Choice Voucher (HCV) A document issued by a PHA to a family selected for admission to the housing choice voucher program. This document describes the program and the procedures for PHA approval of a unit selected by the family. The voucher also states obligations of the family under the program.

HOV Housing Ownership Voucher

Housing Quality Standards (HQS) The HUD minimum quality standards for housing assisted under the voucher program.

HQS Housing quality standards

HUD The Department of Housing and Urban Development

IDA Individual Development Account

Imputed Income An amount of annual income that is not actually received by a family as a result of a specified welfare benefit reduction, but is included in the family’s annual income and therefore reflected in the family’s rental contribution

ISA Individual Savings Account

Jurisdiction The area in which the PHA has authority under state and local law to administer the program

LEP Limited English Proficiency

LIHTC Low Income Housing Tax Credit

Local Preference A preference used by the PHA to select among applicant families.

Low Income Family A family whose income does not exceed 80% of the median income for the area as determined by HUD with adjustments for smaller or larger families, except that HUD may establish income limits higher or lower than 80% for areas with unusually high or low incomes.

MOU Memorandum of Understanding

MTW Moving to Work

NOFA Notice of Funding Availability, a notice of a grant opportunity with eligibility requirements and application instructions

Payment Standard The maximum monthly assistance payment for a family assisted in the

voucher program (before deducting the total tenant payment by the family).

Person with Disabilities (1) Means a person who: (i) Has a disability, as defined in 42 U.S.C. 423; (ii) Is determined, pursuant to HUD regulations, to have a physical, mental, or emotional impairment that: (A) Is expected to be of long-continued and indefinite duration; (B) Substantially impedes his or her ability to live independently, and (C) Is of such a nature that the ability to live independently could be improved by more suitable housing conditions; or (iii) Has a developmental disability as defined in 42 U.S.C. 6001. (2) Does not exclude persons who have the disease of acquired immunodeficiency syndrome or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome; (3) For purposes of qualifying for low-income housing, does not include a person whose disability is based solely on any drug or alcohol dependence; and (4) Means “individual with handicaps”, as defined in 24 CFR 8.3, for purposes of reasonable accommodation and program accessibility for persons with disabilities.

PHA Public housing agency

Portability The ability to move with a Section 8 voucher to a location outside the jurisdiction of the initial PHA.

Port-In A household with a Section 8 voucher from another housing authority where the initial housing authority is being billed for the assistance (See *Portability*)

Port Out A household with a voucher from the VHA, but living outside the jurisdiction of the VHA and where the housing authority in that jurisdiction is billing the VHA

Project-Based Voucher (PBV) A Section 8 voucher that is only usable at an assigned property. The voucher is assigned to the property rather than to the tenant as in a tenant-based voucher.

Public Housing Agency (PHA) Any State, county, municipality, or other governmental entity or public body, or agency or instrumentality of these entities that is authorized to engage or assist in the development or operation of low-income housing under the 1937 Act

QHWRA Quality Housing and Work Responsibility Act of 1998 (also known as the Public Housing Reform Act)

REAC (HUD) Real Estate Assessment Center

Recertification Sometimes called reexamination. The process of securing documentation of total family income used to determine the rent the tenant will pay for the next 12 months if there are no additional changes to be reported.

Section 8 (S8) A general reference to housing programs authorized in Section 8 of the 1937 Housing Act, of which the Housing Choice Voucher program is the largest.

Section 9 (S9) Another term for public housing which is authorized in Section 9 of the 1937 Housing Act

TANF Temporary Assistance for Needy Families, a financial grant to needy families through the Department of Social and Health Services

Tenant-Based Voucher (TBV) A Section 8 Housing Choice Voucher. The voucher is assigned to a tenant who may use the voucher toward rent payment of any rental housing meeting Section 8 guidelines.

TTP Total Tenant Payment The total amount the subsidized rent formula requires the tenant to pay toward rent and utilities

UA Utility Allowance

UAP Utility Allowance Payment, a payment made to a family with a negative rent usually the result of a

utility allowance greater than 30% of the family's income

Very Low Income Family A low-income family whose annual income does not exceed 50% of the median income for the area, as determined by HUD, with adjustments for smaller and larger families. HUD may establish income limits higher or lower than 50% of the median income for the area on the basis of its finding that such variations are necessary because of unusually high or low family incomes. This is the income limit for the housing choice voucher program.

Voucher A document issued by a PHA to a family selected for admission to the housing choice voucher program. This document describes the program and the procedures for PHA approval of a unit selected by the family. The voucher also states obligations of the family under the program.

Work-Able An adult under the age of 62 who is not a person with disabilities or a care taker for a person with disabilities

Workforce Housing Generally refers to rental housing affordable to essential workers in the community. Specifically, VHA bond financed and tax credit properties.