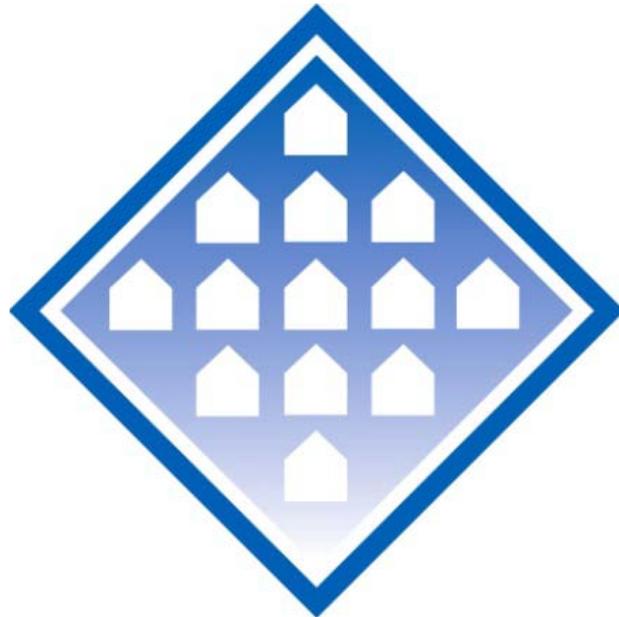


Moving to Work Annual Plan

Vancouver Housing Authority



Fiscal Year 2011

Amended and Submitted to HUD
December 20, 2010

Moving to Work Annual Plan

Vancouver Housing Authority

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SECTION I. MOVING TO WORK GOALS AND OBJECTIVES

The Vancouver Housing Authority

The Vancouver Housing Authority (VHA) is located in Clark County, Washington. Clark County has been one of the fastest growing counties in the nation during the past decade. The VHA is the only housing authority in the county and serves the unincorporated areas and small cities through intergovernmental cooperation agreements. Since 1990 the population of Clark County has increased by almost 80%. In that same time period, poverty in Clark County increased by 53.4%. Today, over 41,000 residents, more than 10% of the population, live below the poverty line in Clark County. We have grown at a time when federal resources have diminished, resulting in long waiting lists for public housing and housing vouchers. We know that a place to call home is important to each of us. It is where a child goes after school, where a job holder goes after work, where an elderly person feels secure, and where a disabled person finds dignity. 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 Moving to Work Demonstration

The Moving to Work (MTW) demonstration offers public housing authorities the opportunity to design and test innovative, locally-designed housing and self-sufficiency strategies. The program has three statutory objectives and in order to meet these objectives allows certain exceptions from federal rules governing the public housing and Section 8 Voucher programs and in some cases offers flexibility in the funding of these programs. The VHA was among the original group selected to participate in MTW in 1999 and our program has been extended four times. More recently, the Department of Housing and Urban Development (HUD) and VHA executed an Amended and Restated MTW Agreement on March 26, 2008. The new Agreement has a term of ten years and will end in 2018. VHA recognizes that the MTW demonstration is a valuable tool for meeting the housing needs of Vancouver and Clark County and that the statutory objectives align with VHA's goals of promoting resident empowerment and self-sufficiency, maximizing the use of federally subsidized housing and rent assistance, and providing opportunities to people who experience barriers to housing because of income, disability or special needs.

The Moving to Work Statutory Objectives:

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

The Moving to Work Annual Plan and Report

As a MTW agency, the VHA is required to adopt an Annual MTW Plan that describes the activities planned for the next fiscal year. At the end of the year the VHA prepares an Annual MTW Report that compares the activities of the completed fiscal year with what was originally planned for that year. The required format and content of these plans and reports are outlined in an attachment to the MTW Agreement. The VHA FY 2011 MTW Annual Plan is for the VHA's fiscal year 2011. The VHA's fiscal year is from January 1 through December 31, the same as the calendar year.

New and Ongoing Moving to Work Initiatives for 2011

VHA is proposing five new activities that will require authorization under the MTW Agreement and HUD approval. The first is a proposal for a minimum rent and/or income limit only for Public Housing units that VHA develops to replace those lost through disposition. This policy will result in higher projected rental revenues allowing the development of replacement Public Housing to be achievable. The second and third proposed activities involve changes to our Project-Based Voucher programs. Allowing "floating" units and up to 50% of units in a project to be project-based will increase the efficiency of this program and allow for new housing opportunities using Project-Based Vouchers and MTW flexibility. The last new activity proposed for 2011 is to allow VHA to inspect our own properties where Housing Choice Vouchers are leased. VHA has noted that a number of other MTW agencies have this activity approved and we expect a significant cost savings and increased efficiency will result.

VHA has twenty MTW activities that will be continuing from past years in 2011. Many of these activities were still being implemented in 2010, so next year will be the first full year of operating under many of these new policies.

New VHA Initiatives Outside of Moving to Work

VHA is proposing a new local preference for certain Public Housing waiting lists that is part of a new program tying housing to services that VHA will be implementing in partnership with the local Washington State Department of Social & Health Services (DSHS) office.

Construction has begun on two new developments, Vista Court and Camas Ridge, which will be completed in 2011. VHA also expects an additional new development, Battle Ground Village, to be finalized in 2011.

Stakeholder Involvement

VHA will continue to use the flexibility provided by the MTW Demonstration to work with community partners to bring new housing opportunities to very-low income resident of Clark County. We will continue to seek input and advice from our Moving to Work Advisory Committee and the Resident Advisory Board as we continue to develop and implement new activities for the MTW Demonstration. During 2010 the VHA Board established the Community Service Committee to further engage community partners to determine needs and areas for potential leveraging of resources.

SECTION II. GENERAL HOUSING AUTHORITY OPERATING INFORMATION

A. Housing Stock Information

Number of Public Housing Units at Beginning of Plan Year

The VHA currently has 553 units of Public Housing, all of which are included in the Moving to Work Demonstration. These units are divided among three Asset Management Properties (AMPs).

Planned Significant Capital Expenditures by Development

Planned Capital expenditures for 2011 include modernization of the Community Center located in AMP 1 and Weatherization and exterior upgrades to various units within both AMP 1 and AMP 2. The Community Center was constructed as part of the Skyline Crest project and is situated within the 150 unit public housing development. The original usage of the facility was administrative offices for the VHA. The Center presently houses tenant services, property management for Skyline, and centralized maintenance. Future goals for the Center focus on increased tenant services with the removal of maintenance functions. Considerable updating and renovation is required in order to adapt to classroom and improved tenant service utilization.

TABLE 1

2011 PLANNED MTW CAPITAL FUND ACTIVITIES

Community	Planned Activities	Budget
Skyline Crest	Community Center Modernization	\$ 400,000
Scattered Sites	Weatherization & Exterior 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		\$960,000

New Public Housing Units Added

VHA will continue to explore development opportunities in 2011 for replacement Public Housing units resulting from the phased disposition of single family units. Currently VHA is in the developmental stages of a mixed income development that will include 10-20 public housing units. Construction of the development is anticipated to commence in 2011, however occupancy will not occur until 2012. VHA is also exploring the feasibility of acquiring existing multi-family units that could be designated as public housing.

Public Housing Units to be Removed from Inventory

The phased disposition of 89 single family homes from Public Housing inventory will continue through 2011. These homes are being disposed of through sale to both Public Housing residents and the general public. These houses are being offered for sale in groups of 10 in order to minimize any effect on the

market that a larger offering might create. As this plan is being drafted 67 homes are still in inventory and VHA expects to still have at least 30 still awaiting sale at the end of 2011.

VHA was recently approved for the disposition of Van Vista, a 100 unit property for elderly and disabled residents that includes an assisted living facility for the majority of units. The removal of this property will allow VHA to obtain financing for a major rehab that will include a new commercial kitchen and dining facility. VHA is expecting to receive Housing Choice Vouchers for the residents of Van Vista, which we plan to project-base at the site.

Next year VHA will undertake an assessment of the remaining Public Housing stock to determine if conversion or disposition would be financially beneficial, and depending upon the outcome of this assessment, may submit additional applications for disposition to the Special Applications Center (SAC) and begin implementation. Also in the coming year VHA may participate in Public Housing Mortgage Program (PHMP) utilizing units approved for disposition but not yet sold, in order to leverage the assets and apply equity to new developments. In this scenario, VHA would use the unsold properties for collateral with the intent of satisfying the mortgages once the properties to be disposed are sold.

Number of Housing Choice Vouchers Funded Under MTW

VHA currently has 1987 Housing Choice Vouchers (HCV) funded under the MTW single fund.

Number of Housing Choice Vouchers Funded Outside of MTW

VHA currently has 195 Housing Choice Vouchers funded under Annual Contributions Contracts (ACC) outside of funding for the MTW demonstration. These include 75 Mainstream vouchers designated for persons with disabilities, 70 Veteran's Affairs Supportive Housing (VASH) vouchers for homeless veterans, and 50 Family Unification Program (FUP) vouchers targeted toward families whose lack of adequate housing is a primary cause of separation between parents and their children and to young adults who have aged out of the foster care system.

VHA also administers a large number of Housing Choice Vouchers that have moved to Clark County using portability and where VHA bills the initial Housing Authority. These currently number 398 and that number is expected to rise to approximately 500 by the end of 2011.

Number of Housing Choice Vouchers to be Project-Based

VHA will project base up to 200 vouchers by the end of 2011. 50 are currently under contract and an additional 70 are committed to a new project for very low-income elderly residents that is expected to be completed in 2011.

B. Leasing Information

Anticipated Number of MTW Public Housing Units to be Leased

The number of Public Housing units to be leased in 2011 will depend on the sales of the single-family homes currently under disposition. VHA expects to begin the year with 540 units under lease and end it with approximately 510 leased.

Anticipated Number of Non-MTW Public Housing Units to be Leased

All of VHA's Public Housing is included in the MTW demonstration; there are no non-MTW public housing units.

Anticipated Number of MTW Housing Choice Vouchers to be Leased

VHA anticipates a lease-up rate of about 98% during the year for about 1948 MTW vouchers leased on average per month.

Anticipated Number of Non-MTW Housing Choice Vouchers to be Leased

Non-MTW vouchers are expected to have a slightly lower lease-up rate due to the dependence upon community partners for tenant selection for the VASH and FUP vouchers. VHA anticipates an average of 185 non-MTW voucher under lease each month in 2011.

Anticipated Issues Relating to Leasing

No significant issues related to leasing are anticipated for 2011.

Number of Project-Based Vouchers In-use

VHA expects to have at least 120 Project-Based Voucher under lease by the end of 2011. This number could be higher (up to 200) depending on the needs of our community partners participating in the Project-Based Vouchers tied to services MTW activity and possible development opportunities that may arise.

C. Waiting List Information

Anticipated Changes in Waiting lists

No major changes to the waiting lists are planned for 2011. Although VHA will explore the possibility of combining the waiting list for Housing Choice Vouchers and the general non site-based Public Housing list. In addition, a new local preference is planned for the site-based lists for Skyline Crest and Fruit Valley. The preference will be for participants in a program with the local TANF agency where applicants identified by case managers as motivated and likely to achieve self-sufficiency if stable housing is provided. This preference will be limited to 15 annually.

Anticipated Changes in the Number of Families on the Waiting Lists

VHA recently opened the waiting lists for a number of bedroom sizes on both site-based and the general Public Housing lists. The opening was for five days and over 1600 applications were received. It is unlikely that there will be a need to open any of the Public Housing lists in 2011.

The waiting list for the HCV program currently contains over 2500 applicants and will likely still contain over 2000 at the end of 2011. We do not anticipate opening this list for several years.

SECTION III. NON-MTW RELATED HOUSING AUTHORITY INFORMATION

A. Planned Sources & Uses of other HUD or other Federal Funds

Table 2 details the anticipated sources and uses of Federal funding not part of the MTW demonstration. This includes the Section 8 New Construction properties, Mainstream, FUP, and VASH Vouchers, and a number of other grants.

VHA was awarded two competitive Stimulus grants for the renovation of Skyline Crest and Van Vista Senior Apartments in 2009. We plan to spend any unused portion of these awards in the 2011 calendar year. They represent approximately \$653,717 and \$279,308 respectively.

TABLE 2
Planned Sources and Uses of other Federal Funds

Sources	
Rental Income	604,233
HUD and Other Grants	2,281,833
HUD Stimulus Awards	933,025
Other Revenue	936,377
Investment Income	36,131
Total	4,791,599
Uses	
Administrative Expenses	2,175,615
Maintenance	105,200
Utilities	149,360
Insurance and other Expenses	37,187
Housing Assistance Payments	744,900
Interest Expense	86,069
Capital Expenditures	277,700
Capital Expenditures - Stimulus	933,025
Less Principle & Reserve Contributions	395,724
Transfers To (From)	(277,700)
Total	4,627,080
Net Income (Deficit)	164,519

B. Non-MTW Activities Proposed by the Housing Authority

VHA will continue to explore development opportunities in 2011, including opportunities that utilize replacement Public Housing units and Project-Based Vouchers. Two new projects will be completed in 2011. The first will be Camas Ridge Apartments, a 51-unit residential property located on the east side of Prune Hill in the city of Camas. This development is part of VHA's Workforce Housing portfolio and will contain units for residents with income between 50 and 80 percent of the Area Median Income (AMI). Special attention has been given to sustainable development practices in the design plan, which follows Washington State "Evergreen Sustainable Development Standards." All units will feature energy star appliances, added insulation, recycled material in a variety of construction components, engineered wood products, Cementitious siding materials, low VE paints and sealers, recycled paint, no formaldehyde in interior composite wood products, individual unit ventilation systems, insulated windows, and more. Energy efficient lighting is used throughout the project for interior and exterior lighting. Construction began on this project on August 20, 2010.

The Second project under construction to be completed next year is Vista Court, formally referred to as the Van Vista addition. This project will contain 76 units for seniors and is located in the downtown Vancouver area near a bus line, senior center, and Esther Short Park. The project will utilize Project-Based Vouchers and will provide housing for very-low income seniors with incomes below 50% of AMI.

Additional projects may be completed in 2011, including a 112 unit project in the city of Battle Ground, a 19 unit mixed use facility for mental health case managed clients, and the renovation of Van Vista.

SECTION IV. LONG-TERM MOVING TO WORK 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 180 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. VHA is also developing a lease-purchase program.

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, and 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

Since its beginning in 1942, 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 forum for dialog. Creation of a Moving to Work Advisory Committee allows for greater participation from community stakeholders.

SECTION V. PROPOSED MTW ACTIVITIES: HUD APPROVAL REQUESTED

VHA is proposing five new MTW activities for 2011. VHA is also introducing a new numbering approach for both new and ongoing MTW activities as suggested by HUD in their comments on the FY 2009 MTW Annual Report. The activity number contains the Plan year the activity was first proposed followed by a number corresponding to the sequence in which the activity appeared in the Plan. This should eventually make tracking of activities over time easier.

Activity 2011-01: Minimum Rent and/or Income Limits for New Public Housing Units

Description

When developing replacement Public Housing units VHA plans to set a minimum rent and/or a minimum income limit for applicants to the new project. The minimum rent would be higher than the one currently allowed under regulation. The minimum income would still be well below the very-low income limit at 50% of Area Median Income (AMI). For example the current average tenant rent in VHA Public Housing is just over \$200. If that could be increased to around \$400 through a minimum rent or an income limit around 40% of the local AMI then, coupled with the approximately \$240 VHA receives in monthly operating subsidy for each Public Housing unit, the total could be adequate for a new Public Housing unit to be placed in a new mixed income development. The actual minimum rent and/or income limit will depend on the requirements of any new project.

Relation to Statutory Objectives

This activity will facilitate the creation of new housing opportunities and will increase housing choice for low-income families.

Impact on Statutory Objectives

VHA has found that the current average tenant rents in Public Housing along with the unit share of Operating Subsidy results in an inadequate projection of revenue for development of new Public Housing units. This activity will allow for higher projected rent revenue and when possibly combined with the flexibility under the Single-Fund budget, will allow for the development of new replacement units of Public Housing.

Metrics and Data Collection

The metrics will be the number of new Public Housing Units created using this MTW activity. The baseline is zero and the initial benchmark will be ten new replacement units within two years. Note that VHA is in the process of a phased disposition of Public Housing Units and will have more replacement units available at a later date.

Authorizations

This activity is authorized under Sections C. 2. and C.11. of Attachment C of the Amended and Restated Agreement.

Activity 2011-02: Allow “Floating Units” in Project-Based Voucher Programs

Description

Current regulations governing the Project-Based Voucher (PBV) program require an amendment to the Housing Assistance Payments (HAP) contract when changing specific units to be project-based within a project. This activity will allow the subsidized units to “float” or change when, for example, a new tenant needs a different size unit or when a tenant no longer requires the subsidy but wants to remain in-place. Having this flexibility is needed as part of the already implemented MTW activity that links PBV to services provided by local community agencies (MTW Activity 2008-01). One of the goals of that program is to have participants remain in their units once case-management is completed and the PBV subsidy ends. Floating PBV units, along with a number of other already approved flexibilities under MTW, will facilitate the overall success of VHA’s PBV program.

Relation to Statutory Objectives

This activity as part of the VHA PBV program of linking subsidies to services is related to the objectives of increasing housing choice and providing incentives toward self-sufficiency.

Impact on Statutory Objectives

This will support the concept of “transition in place” for those project-based units with supportive services and will decrease the likelihood that a unit would be stigmatized as “the low income unit”.

Metrics and Data Collection

This activity will share the existing metrics of the number of new PBV units tied to services and the number of participants meeting case-management goals and increasing their income. Authorizations

The activity is authorized under Section D.7. of Attachment C of the Amended and Restated Agreement waiving 24 CFR 983.206.

Activity 2011-03: Allow up to 50% of Units in a Project to be Project-Based

Description

This activity will waive the current requirement that the number of project-based units in a project be limited to 25% and will allow the VHA to enter into HAP contracts under the PBV program where up to 50% of the units will be included. Although the regulation allows a Housing Authority to exceed 25% for elderly or disabled designated units and families receiving supportive services, it requires the Housing Authority to monitor each family’s receipt of services and their compliance with supportive service requirements. With this activity VHA will have greater flexibility and will be able to enter into a greater range of PBV agreements that meet the needs of our community.

Relation to Statutory Objectives

This activity will facilitate the creation of new housing opportunities and will increase housing choice for low-income families.

Impact on Statutory Objectives

The activity will allow for a greater variety of properties available for PBV and increase options for tenants.

Metrics and Data Collection

The metric will be the number of new units under PBV contracts where more than 25% of the units in the project are under contract. The baseline will be zero and the benchmark will be 50 units within two years.

Authorizations

The activity is authorized under Section D.7. of Attachment C of the Amended and Restated Agreement waiving 24 CFR 983.56.

Activity 2011-04: VHA Staff to Perform HQS Inspections and Rent Reasonableness on VHA Owned Properties

Description

This activity will allow VHA staff with the Housing Choice Voucher program to complete required HQS inspections and rent reasonableness determinations on HCV units located in VHA owned units or units owned by entities substantially controlled by the VHA. VHA currently has about 300 participants in the HCV program who have chosen VHA owned rental units. This results in VHA hiring outside inspectors for over 400 inspections along with rent-reasonableness determinations a year. VHA assumes that the intent of regulation requiring outside inspectors is intended to prevent a conflict of interest; however VHA believes there is little likelihood of that should VHA perform their own inspections. Inspection staff are substantially independent from asset management staff, VHA owned properties typically are inspected and have their rent monitored by independent agencies already (such as the State agency enforcing tax-credit programs), and there is little difference in independence between an employee of the VHA and one contracted by the VHA for a specific job.

Relation to Statutory Objectives

This proposed activity will result in reduced costs and great cost effectiveness in the HCV program.

Impact on Statutory Objectives

VHA anticipates a significant savings by performing our own inspections over the amounts currently charged by outside entities.

Metrics and Data Collection

The metric will be the number of HQS inspections and rent reasonableness determinations made for VHA owned properties. The savings will be imputed by comparing VHA's actual cost with what VHA would have been charged by an outside entity. Currently VHA's cost per inspection averages \$45.16

including salaries, benefits, overhead, and transportation and is being charged \$75.00 an inspection by the County. The anticipated savings is almost \$30 per inspection. The baseline will be zero and the benchmark will be a projected savings of \$5000 in the first year.

Authorizations

The activity is authorized under Sections D.2. c. and D.5. of Attachment C of the Amended and Restated Agreement waiving 24 CFR 983.59 and 24 CFR 982.352.(b).

TABLE 3
Summary of Proposed MTW Activities

Activity Number	MTW Activity	Statutory Objective	Anticipated Impact	Metric	Baseline	Benchmark	Authorization Cited	Hardship Information
2011-01	Minimum rent & income limits for new Public Housing units	Increase housing choice	Will allow for replacement Public Housing units in new developments	New replacement Public Housing units created	Zero	Ten new Public Housing units in new development(s) within 2 years	Sections C. 2. & C. 11. in Attachment C of the MTW Agreement	Will be incorporated into current hardship policy
2011-02	Allow "Floating Units" in Project-Based Voucher Programs	Efficiency and cost reduction	Reduce cost and support "transition in place"	Number of PBV units and number of families meeting goals and increasing income	Zero units, Zero families meeting goals and family income at lease-up	50 units, 50% of exiting families meeting goals, and income increased by 50%	Section D. 7. in Attachment C of the MTW Agreement	Not applicable
2011-03	Allow up to 50% of Units in a Project to be Project-Based	Increase housing choice	Allow for new properties available for very-low income residents	The number of new project-based units in projects with more than 25%	Zero	50 units within two year	Section D. 7. in Attachment C of the MTW Agreement	Not applicable
2011-04	VHA Staff to Perform HQS Inspections and Rent Reasonableness on VHA Owned Properties	Efficiency and cost reduction	Cost saving and increased efficiency	Number of inspections completed in VHA property and imputed savings	Zero	Savings of \$5000 in first year	Sections D. 2. C. & D. 5. in Attachment C of the MTW Agreement	Not applicable

SECTION VI. ONGOING MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

Activity 2010-01: Community Involvement and Educational Opportunity Initiative

This activity requires that work-able adults in the Housing Choice Voucher program perform community service or self-sufficiency activities if they are not working at least 25 hours per week or already enrolled in a self-sufficiency program. Together with the existing requirement for Public Housing residents, this provides an opportunity for new experience, personal growth and self-enrichment for all recipients of subsidized housing through VHA who are able to, but not currently, working.

Plan Year First Identified and Implemented

This activity was identified in the VHA 2010 Annual Plan and implementation began being phased in as participants had their annual eligibility reviews in 2010.

Update on Status of Activity

VHA has a full-time Community Involvement and Employment Manager who monitors compliance and provides information about community service and self-sufficiency activities to participants. The activity has been well received by the community and by the vast majority of participants.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes to be made in 2011.

Outside Evaluators

No outside evaluations are planned.

Activity 2010-02: Skyline Crest Campus of Learners

The Skyline Crest Campus of Learners is a partnership between VHA and the residents of Skyline Crest; VHA's largest Public Housing Property. VHA provides children and young adults' resources and activities through the community center and families develop and commit to success plans centered on their child's school attendance and community involvement.

Plan Year First Identified and Implemented

This activity was identified in the VHA 2010 Annual Plan and is anticipated to be fully implemented by the end of the year.

Update on Status of Activity

As noted above, the Campus of Learners is still in transition. Most residents have completed their success plans and many of the resources and services are in place. The residents have elected a resident council and bylaws have been adopted. A new lease containing program requirements is currently out for public comment and a final version will be adopted shortly.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes to be made in 2011.

Outside Evaluators

No outside evaluations are planned.

Activity 2010-04:

Waiting List Preference for Applicants Without Housing Subsidy

This activity creates a local preference in the VHA Housing Choice Voucher and Public Housing waiting lists for applicants not already receiving subsidized housing. As a MTW activity it waives the requirement that a local waiting list preference in the Housing Choice Voucher program not be denied for a Public Housing resident.

Plan Year First Identified and Implemented

This activity was identified in the VHA 2010 Annual Plan and was implemented at the beginning of 2010

Update on Status of Activity

Currently the local preference is in place and the waiting lists are ranked accordingly. When implemented all applicants were mailed notices of the new preference and were given opportunity to claim this preference.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes to be made in 2011.

Outside Evaluators

No outside evaluations are planned.

Activity 2009-02:

Imputed TANF Income for Voluntary Grant Closures

VHA imputes a full TANF grant for participants who voluntarily close their grants rather than face sanction due their failure to comply with the work activities program or fraud. This extends the current HUD policy on imputing TANF income and closes a loophole where participants were able to get a lower rent after violating the requirements of an agency working in close partnership with the VHA.

Plan Year First Identified and Implemented

This activity was identified in the VHA FY 2009 Annual Plan and was implemented beginning January 1, 2009.

Update on Status of Activity

This policy continues in place, although the number of cases where it is utilized is very low.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes to be made in 2011.

Outside Evaluators

No outside evaluations are planned.

Activity 2009-03: No Verification of Assets Less Than \$5000

VHA does not obtain a verification of a reported asset if the reported value is less than \$5000. This MTW activity saves VHA significant administrative funds by eliminating verifications on the vast majority of assets and any income from those assets that has little or no effect on housing subsidy and/or tenant rent.

Plan Year First Identified and Implemented

This activity was identified in the VHA FY 2009 Annual Plan and was implemented beginning January 1, 2009.

Update on Status of Activity

This activity continues to remain in force.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes to be made in 2011

Outside Evaluators

No outside evaluations are planned.

Activity 2009-06: Alternate Required HQS Inspection Schedule

VHA performs a Housing Quality Inspection (HQS) inspection prior to approving a new lease in the Housing Choice Voucher program and then performs subsequent inspections every-other-year. On alternate years the landlord and tenant self-certify that the unit meets HQS.

Plan Year First Identified and Implemented

Although VHA first identified a proposed alternate inspection schedule for the HCV program in the FY 2007 it was not implemented that year and was redesigned and identified again in an amendment to the FY 2009 Plan. The activity was implemented on January 1, 2010.

Update on Status of Activity

Activity is being implemented as units approach their anniversary date from their last inspection. Generally the new inspection policy has been well received by owners and tenants.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes to be made in 2011

Outside Evaluators

No outside evaluations are planned.

Activity 2009-07: Investing in State Permitted Instruments

This activity allows VHA to invest certain funds received from HUD consistent with Washington State law and to possibly obtain higher returns than would have occurred otherwise.

Plan Year First Identified and Implemented

This activity was identified in the VHA FY 2009 Annual Plan and was implemented beginning January 1, 2009.

Update on Status of Activity

VHA continues to utilize this policy although at the current time the rates of return remain low for most investments.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes to be made in 2011

Outside Evaluators

No outside evaluations are planned.

Activity 2009-08: Simplified Utility Allowance Schedule

VHA utilizes a simplified utility allowance schedule in the Housing Choice Voucher program that simplifies rent calculations, particularly for participants prior to leasing, and encourages reduced energy consumption.

Plan Year First Identified and Implemented

This activity was identified in an amendment to the VHA FY 2009 Annual Plan and was implemented beginning September 24, 2009.

Update on Status of Activity

The new allowance is being implemented as participants move or have a required reexamination.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes to be made in 2011

Outside Evaluators

No outside evaluations are planned.

Activity 2009-09: Limited Utility Allowance Payments

For both Public Housing and the Voucher program, tenants whose rent calculation results in a negative rent (also known as a Utility Allowance Payment or UAP) are only allowed to receive the payment for six months unless a hardship exception is granted.

Plan Year First Identified and Implemented

This activity was identified in an amendment to the VHA FY 2009 Annual Plan and was implemented beginning October 1, 2009.

Update on Status of Activity

This activity is now fully implemented and the majority of tenants and participants who previously received a payment are no longer receiving one.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes to be made in 2011

Outside Evaluators

No outside evaluations are planned.

Activity 2009-10: Replacement of Medical Expense Deduction

Under this activity the VHA has eliminated individual calculation and verification of medical expenses for Elderly and Disabled designated families, replacing the deduction with a Elderly/Disabled deduction increase to \$700.

Plan Year First Identified and Implemented

This activity was identified in an amendment to the VHA FY 2009 Annual Plan and was implemented beginning November 5, 2009.

Update on Status of Activity

This activity is being implemented as families come up for their scheduled reexamination. Because Elderly and Disabled families were on a biennial schedule and are now moving to a triennial schedule, it will be a while before all families are affected and the full impact is known.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes to be made in 2011

Outside Evaluators

No outside evaluations are planned.

Activity 2009-11: 40% Maximum Family Share Expanded to Ongoing Tenancy

VHA has taken the 40% maximum family share normally applied at contract approval in the Housing Choice Voucher program and expanded it to subsequent reexaminations as well. If, at a reexamination, the rent calculation results in a family share greater than 40% of the family's adjusted monthly income, the family is required to reduce their share to less than 40% through an increase in income or a move to a less expensive unit within one year, or they may receive an exemption through participation in a self-sufficiency program or the hardship policy.

Plan Year First Identified and Implemented

This activity was identified in an amendment to the VHA FY 2009 Annual Plan and was implemented beginning September 1, 2009.

Update on Status of Activity

Because participants who were already paying more than a 40% family share are exempt from this policy as long as they remain in the same assisted unit, this activity has yet to impact many participants.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes to be made in 2011

Outside Evaluators

No outside evaluations are planned.

Activity 2009-13:

Next Required Reexamination 12 Months after Interim

This MTW activity provides that the next required reexamination (AKA Annual Review) will be rescheduled to at least 12 months after the effective date of an interim reexamination. This policy reduces the overall number of reexaminations required each year.

Plan Year First Identified and Implemented

This activity was identified in an amendment to the VHA FY 2009 Annual Plan and was implemented beginning October 1, 2009.

Update on Status of Activity

The activity is ongoing for both Public Housing and Housing Choice Voucher programs.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes to be made in 2011

Outside Evaluators

No outside evaluations are planned.

Activity 2009-15:

Owners Restricted to Annual Rent Increases

Under this MTW policy owners in the Housing Choice Voucher program are restricted to a single rent increase each year.

Plan Year First Identified and Implemented

This activity was identified in an amendment to the VHA FY 2009 Annual Plan and was implemented beginning September 1, 2009.

Update on Status of Activity

This policy remains in effect. Landlords generally understand the need for the policy and no complaints have been received.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes to be made in 2011

Outside Evaluators

No outside evaluations are planned.

Activity 2009-16: Renter Education Required for Applicants

Under this activity new applicants for Public Housing and the Housing Choice Voucher program must complete a rent education course prior to being offered a unit or voucher when they reach the top of the waiting list. The course covers topics including money management and credit, landlord/tenant rights and responsibilities, how to be a good renter, and how to find landlords that will rent to you. Applicants who complete the course receive a certificate of completion that is recognized by many landlords in the community and can substitute for good credit and references in tenant screening policies.

Plan Year First Identified and Implemented

This activity was identified in an amendment to the VHA FY 2009 Annual Plan and was implemented beginning September 1, 2009.

Update on Status of Activity

This activity will continue in 2011.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes to be made in 2011

Outside Evaluators

No outside evaluations are planned.

Activity 2009-19: Separate Waiting List for Assisted Living Facility

The MTW activity allows for a separate waiting list for a assisted living facility that is located at a Public Housing site that includes other Public Housing units.

Plan Year First Identified and Implemented

This activity was identified in an amendment to the VHA FY 2009 Annual Plan and was implemented beginning August 25, 2009.

Update on Status of Activity

This policy will remain in place for 2011 and will continue facilitate a more efficient tenant selection process for the Public Housing site than a site-based or program-wide list would.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes to be made in 2011

Outside Evaluators

No outside evaluations are planned.

Activity 2008-01: Project-Based Vouchers Tied to Services

The VHA's MTW Section 8 Project Based Program partners with other community organizations in order to provide housing assistance tied to case management and other services. The activity also waives the bidding process for VHA owned units, enabling VHA to offer rental units along with the needed subsidy to the partnering agency. Tenant selection may be done by the partner so that appropriate clients they have already identified can be readily served. The partnering agency may also place time limits on assistance and the availability of a tenant based voucher after one-year is also eliminated.

Plan Year First Identified and Implemented

This activity was first identified in the VHA FY 2008 Annual Plan and implemented on May 28, 2008.

Update on Status of Activity

This activity will be ongoing in 2011.

Anticipated Changes, Modifications, or Additions

There will likely be a small increase in the number of project-based units in this program in the coming year.

Outside Evaluators

No outside evaluations are planned.

Activity 2008-02: Alternative HCV Homeownership Program

Under this MTW activity the VHA has reduced the maximum term of homeownership assistance to ten years if the initial mortgage is 20 years or longer and seven years in other cases.

Plan Year First Identified and Implemented

This activity was first identified in the VHA FY 2008 Annual Plan and implemented on May 28, 2008.

Update on Status of Activity

VHA will continue to expand and promote the Housing Choice Voucher homeownership program in 2011.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes to be made in 2011

Outside Evaluators

No outside evaluations are planned.

Activity 2007-02: Alternate Required Reexamination Schedule

Last year VHA moved from a biennial schedule for required reexaminations in Public Housing and the HCV program to one where families on fixed income have a reexamination of eligibility every three years and other families return to the annual schedule. The families on the three year schedule will have rent and assistance recalculated using the current payment standard and utility allowance schedules as applicable and the COLA published by the Social Security Administration (if any) during years that they do not have a full reexamination.

Plan Year First Identified and Implemented

This activity was identified in the FY 2007 Annual Plan and implemented on January 1, 2008. The schedule was modified and described in an amendment to the FY 2009 Plan and the new schedule of triennial reexamination for fixed income families and annual reexaminations for all others was implemented on January 1, 2010.

Update on Status of Activity

This activity will be ongoing in 2011.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes to be made in 2011

Outside Evaluators

No outside evaluations are planned.

Activity 1999-08: No Flat Rent Option in Public Housing

VHA used authority under the MTW demonstration to not implement the flat rent option in Public Housing. The option of a flat rent rather than the income based one benefits higher income tenants, allowing them to use a resource that VHA believes should remain available for the lowest income applicants. VHA uses a ceiling rent and restricts tenants to the ceiling rent for one year. In this way the higher income tenant move on to other housing available in the community making the Public Housing unit with its deep subsidy available to new applicants.

Plan Year First Identified and Implemented

VHA's rent policy for the MTW demonstration was first identified in the 1999 agreement, implemented that year, and did not contain a flat rent policy.

Update on Status of Activity

This activity will be ongoing in 2011.

Anticipated Changes, Modifications, or Additions

VHA is not planning any changes to this policy next year.

Outside Evaluators

No outside evaluations are planned.

Activity 1999-09: No Earned Income Disallowance in Public Housing

VHA has opted to not offer an Earned Income Disallowance (EID) in Public Housing. Under an earlier MTW activity all families were given an escrow account when they had increased earnings; escrow accounts are still available under the FSS program. VHA has concluded that building an asset is preferred to a temporary rent reduction and continues to not offer an EID to encourage participation in FSS and to eliminate the administrative burden of tracking various disallowance periods.

Plan Year First Identified and Implemented

VHA's rent policy for the MTW demonstration was first identified in the 1999 agreement, implemented that year, and did not contain a earned income disallowance.

Update on Status of Activity

This policy will continue to be in place for the coming year.

Anticipated Changes, Modifications, or Additions

There are no anticipated changes planned for this activity.

Outside Evaluators

No outside evaluations are planned.

TABLE 4
SUMMARY OF ONGOING MTW ACTIVITIES FOR 2011

Number	Activity	Plan Year Identified	Current Status
2010-01	Community Involvement and Educational Opportunity Initiative	FY 2010 Annual Plan	Ongoing
2010-02	Skyline Crest Campus of Learners	FY 2010 Annual Plan	Ongoing
2010-04	Local Preference for Applicants without Housing Subsidy	FY 2010 Annual Plan	Ongoing
2009-02	Imputed TANF Income for Voluntary Grant Closures	FY 2009 Annual Plan	Ongoing
2009-03	No Verification of Assets Less Than \$5000	FY 2009 Annual Plan	Ongoing
2009-06	Alternate Required HQS Inspection Schedule	FY 2009 Annual Plan	Ongoing
2009-07	Investing in State Permitted Instruments	FY 2009 Annual Plan	Ongoing
2009-08	Simplified HCV Utility Allowance Schedule	FY 2009 Annual Plan	Ongoing
2009-09	Limited Utility Allowance Payments	FY 2009 Annual Plan	Ongoing
2009-10	Replacement of Medical Expense Deduction	FY 2009 Annual Plan	Ongoing
2009-11	40% Maximum Family Share Expanded to Ongoing Tenancy	FY 2009 Annual Plan	Ongoing
2009-13	Next Required Reexamination 12 Months after Interim	FY 2009 Annual Plan	Ongoing
2009-15	Owners Restricted to Annual Rent Increases	FY 2009 Annual Plan	Ongoing
2009-16	Renter Education Required for Applicants	FY 2009 Annual Plan	Ongoing
2009-19	Separate Waiting List for Assisted Living Facility	FY 2009 Annual Plan	Ongoing
2008-01	Project-Based Vouchers Tied to Services	FY 2008 Annual Plan	Ongoing
2008-02	Alternative HCV Homeownership Program	FY 2008 Annual Plan	Ongoing
2007-02	Alternate Required Reexamination Schedule	FY 2007 Annual Plan	Ongoing
1999-08	No Flat Rent Option in Public Housing	1999 MTW Agreement	Ongoing
1999-09	No Earned Income Disallowance in Public Housing	1999 MTW Agreement	Ongoing

TABLE 5**SUMMARY OF PAST VHA INITIATIVES IDENTIFIED WHEN PROPOSED AS MTW ACTIVITIES**

Number	Activity	Year Concluded and Reason
2010-03	Use of S8 or S9 funds outside of 1937 Act	Still in planning, will require amendment to Agreement
2009-01	Pilot rental subsidy project	Withdrawn due to funding and other issues
2009-04	Asset-based initiatives	Ongoing, but element requiring MTW withdrawn
2009-05	Simplified development process	Does not meet current definition of MTW activity
2009-12	Three year recertification schedule	Combined with ongoing activity 2007-02
2009-14	Simplified required recertification process	Withdrawn due to technical issues
2009-17	Self-sufficiency pilot program (Yes We Can)	Withdrawn in favor of other self-sufficiency programs
2009-18	Local preference for participation in FSS program	Withdrawn due to FSS NOFA requirements
2008-03	Seek to increase the housing subsidy available	Ongoing but does not meet definition of MTW activity
2008-04	Create new occupancy and rent policies	Completed, with policies identified separately
2008-05	Streamlining and simplification of Public Housing	Completed, does not meet definition of MTW activity
2008-06	Create site-based wait lists	Completed, does not meet definition of MTW activity
2008-07	Change definition of Elderly for admission	Withdrawn after additional consideration
2008-08	Smoke free policies	Completed, does not meet definition of MTW activity
2008-10	Adopt local preferences toward ending homelessness	Need being met through HCV Project-Based activity
2008-11	Alternative inspection policies for Public Housing	Withdrawn after additional consideration
2008-12	Alternative inspection policies for HCV	Ongoing and revised to MTW activity 2009-06
2008-13	Local system of income verification	Ongoing and revised to MTW activity 2009-03
2008-14	Upgrade computer systems	Completed, does not meet definition of MTW activity
2008-15	Work with other regional MTW agencies	Ongoing but does not meet definition of MTW activity
2008-16	State over Federal investment policies	Ongoing and revised to MTW activity 2009-07
2008-17	Mandatory self-sufficiency policies	Withdrawn after additional consideration
2008-18	Maintain operating reserves	Ongoing but does not meet definition of MTW activity
2008-19	Maintain security at Public Housing properties	Ongoing but does not meet definition of MTW activity
2008-20	Expand partnerships with non-profits	Ongoing, in part through HCV Project-Based activity
2008-21	Consider transitional housing programs	Withdrawn after additional consideration
2008-22	Simplified development and re-development policy	Does not meet current definition of MTW activity
2008-23	Purchase properties without HUD approval	Not utilized to date
2008-24	Commercial business ventures	Withdrawn and not necessarily a MTW activity
2008-25	Maintain properties to community standards	Ongoing but does not meet definition of MTW activity
2008-26	Develop a comprehensive energy savings plan	Completed, does not meet definition of MTW activity
2007-01	Flat rent and flat HCV subsidy	Withdrawn after additional consideration
2004-01	Alternative rent reasonable procedure	Concluded in 2009 due to improved procedure
2003-01	Escrow accounts capped at \$6000	Concluded in 2005 along with mandatory program
2002-01	"Request Line" single waiting list	Concluded in 2003 due to various issues
2001-01	8% earned income deduction	Concluded in 2004 due to financial considerations
2001-02	\$480 deduction for child support payments	Concluded in 2004 due to financial considerations
1999-01	All Port-ins absorbed by the VHA	Ended in 2002 due to financial considerations
1999-02	Mandatory participation in self-sufficiency program	Concluded in 2005 due to hardship considerations
1999-03	Five-year time limit on housing assistance	Concluded in 2005 due to hardship considerations
1999-04	FSS absorbed into MTW self-sufficiency program	Concluded in 2005 due to hardship considerations
1999-05	All households able to create escrow accounts	Concluded in 2005 due to hardship considerations
1999-06	Restrictions on Voucher port-outs	Concluded in 2005 due to hardship considerations
1999-07	Maximum family share 45% of gross income	Ended in 2008 due to rent burden concerns

SECTION VII. SOURCES AND USES OF FUNDING

A. Planned Sources and Uses of MTW Funds

Table 6 contains the detail of the anticipated sources and uses of fund for the programs funded under MTW.

TABLE 6
Planned Sources and Uses of other Federal Funds

	Public Housing	Capital Fund	HCV	Total MTW
Sources				
Rental Income	1,421,429	-	-	1,421,429
HUD and Other Grants	1,578,073	334,890	12,515,970	14,428,933
Other Revenue	354,649	91,928	200,000	646,577
Investment Income	14,030	-	50,000	64,030
Total	3,368,181	426,818	12,765,970	16,560,969
Uses				
Administrative Expenses	2,621,520	322,105	1,640,865	4,584,490
Maintenance	255,000	-	6,000	261,000
Utilities	349,360	-	-	349,360
Insurance and other Expenses	94,226	-	3,464	97,690
Housing Assistance Payments	-	-	11,533,400	11,533,400
Interest Expense	-	-	-	-
Capital Expenditures	-	-	-	-
Less Principle & Reserve Contributions	1,033	-	-	1,033
Transfers To (From)	(335,009)	-	(420,000)	(755,009)
Total	2,986,130	322,105	12,763,729	16,071,964
Net Income (Deficit)	382,051	104,713	2,241	489,005

B. Planned Sources and Uses of State or Local Funds

Table 7 contains the detail of the anticipated sources and uses of all funds outside of the MTW program and the other Federal programs detailed in Section III.

TABLE 7
Planned Sources and Uses of State or Local Funds

Sources	
Rental Income	17,445,466
HUD and Other Grants	487,716
Other Revenue	2,730,522
Investment Income	3,151,237
Total	23,814,941
Uses	
Administrative Expenses	7,655,630
Maintenance	1,735,462
Utilities	1,652,838
Insurance and other Expenses	1,043,153
Housing Assistance Payments	48,000
Interest Expense	8,545,796
Capital Expenditures	412,800
Less Principle & Reserve Contributions	2,730,075
Transfers To (From)	(142,800)
Total	23,680,953
Net Income (Deficit)	133,987

C. Planned Sources and Uses of the COCC

The VHA Central Office Cost Center (COCC) planned sources and uses are shown in Table 8. Please note that the COCC is part and parcel of the State and Local Funds.

D. Cost Allocation or Fee-for-Service

VHA plans to follow a fee-for-service approach to pay for indirect administrative expenses in 2011. Administrative fees are established by HUD for Low Rent Public Housing, Housing Choice Vouchers and Capital Fund programs. Where such fees are not present, VHA will establish rates in compliance with OMB Circular A-87 and the 1937 Act.

E. Planned 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.

We plan to continue activities begun in 2010 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. For example, single-fund flexibility is being utilized to fund staff operating the Community Involvement and Educational Opportunity activity. The single-fund is also funding the renter education classes (MTW Activity 2009-16) and supporting the FSS programs.

Capital Fund Program

We intend to continue to use CFP to help fund programs at the Rise and Stars Community Center. The Community Center includes programs such as Smart Choices. SmartChoices provides a range of services for youth and adults. The program assists youth to stay in school, prepare for important educational and career choices, and become self-sufficient adults. For adults, SmartChoices provides skill assessment, connections to education and training, and career and job development. Some of the additional

TABLE 8
Planned Sources and Uses of the COCC

Sources	
Public Housing Management Fee	281,957
Public Housing Bookkeeping Fee	47,340
Public Housing Asset Management Fee	63,120
CFP Management Fee	115,454
HCV Management Fee	238,440
HCV Bookkeeping Fee	178,830
Investment Income - Operating	55,000
Investment Income - Pass through	2,858,016
Misc Income	1,065,404
Total	4,903,561
Uses	
Administrative Expenses	2,529,018
Maintenance	53,000
Utilities	47,390
Insurance and other Expenses	254,148
Housing Assistance Payments	-
Interest Expense	211,470
Interest Expense - Pass through	2,707,398
Capital Expenditures	27,600
Less Principle & Reserve Contributions	154,000
Transfers To (From) Reserves	(1,097,600)
Total	4,886,424
Net Income (Deficit)	17,137

services available at the Community Center are childcare, a computer lab, homework help, sports and recreation, arts and crafts, and parties and special events.

Single fund flexibility may also be used to fund pre-development and development of new mixed income properties that may contain replacement public housing units.

Low Rent Public Housing

Disposition funds will be used to develop new properties as provided in our latest approved disposition application. Public Housing operating funds will continue to fund operations. We want to be conservative in this area given the additional administrative burden of dividing properties into three separate AMPS and the administrative requirements of project based accounting and FDS reporting.

F. Planned Reserve Balances

Table 9 details VHA Reserve Balances for Federal programs as of June 30, 2010. HCV and Low Rent Public Housing reserves are expected to remain stable for the rest of the year and into the 2011 Plan year. Other Federal programs will remain stable as well.

TABLE 9
VHA Reserve Balances

Housing Choice Vouchers	\$3,874,960
Public Housing	935,371
Public Housing Disposition Funds	3,262,933
Other Federal Funds	741,332
Total	7,217,388

SECTION VIII. ADMINISTRATIVE

A. Resolution Adopting the Annual Plan Certification of Compliance

The Board of Commissioners of the Vancouver Housing Authority passed Resolution No. 2897 on September 22, 2010 approving the 2011 Moving to Work Annual Plan and adopting the Annual Moving to Work Plan Certifications of Compliance. Copies of the Resolution and Certification in located in Appendix A.

B. Agency Directed Evaluations

The VHA has no agency directed evaluations outside of the required elements in the Annual MTW Plan and Report.

APPENDIX A. BOARD RESOLUTION & CERTIFICATION

HOUSING AUTHORITY OF THE CITY OF VANCOUVER

CLARK COUNTY WASHINGTON

RESOLUTION NO. 2897

RESOLUTION TO APPROVE THE MOVING TO WORK ANNUAL PLAN FOR FISCAL YEAR 2011

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 2011 has been prepared and made available for public comment for thirty days and a public hearing was held on September 2, 2010.

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

1. The Board of Commissioners approves the 2011 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 22th day of September, 2010.

ATTEST:



Roy A. Johnson, Secretary-Treasurer



Ceci Ryan Smith, 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 PHIA fiscal year beginning January 1, 2011, 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.

OMB Control Number: 2577-0216
Expiration Date: 08/31/2011

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.

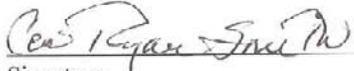
Vancouver Housing Authority
PHA Name

WA008
PIIA 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)

Ceci Ryan Smith
Name of Authorized Official

Chairman
Title


Signature

September 22, 2010
Date

APPENDIX B. PUBLIC PROCESS & PUBLIC COMMENTS

The 2011 MTW Annual Plan was published on August 2, 2010 for a 30-day comment period. A public hearing was held on September 2, 2010. The 2011 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 2, 2010. Notice was published in the Neighbor to Neighbor, the newsletter mailed to every VHA public housing resident and HCV participant. Documentation of this advertizing is included at the end of this Appendix.

Meetings were held as the plan was being developed with the VHA MTW Advisory Committee and the Resident Advisory Board. 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 16, 2010.

During the comment period VHA received two letters regarding the Plan, one from Clark County Regional Support Network (CCRSN) and the other from Columbia Legal Services (CLS). Copies are included in this Appendix.

The following table summarizes comments received during the public process and VHA’s response.

**TABLE 9
SUMMARY OF PUBLIC COMMENTS ON THE VHA 2011 MTW ANNUAL PLAN**

SOURCE	COMMENT	VHA RESPONSE
RAB Meeting	Will there be a “watchdog” to verify that units are adequately inspected?	Yes, most VHA owned properties are inspected by other agencies and VHA conducts quality control inspections as well.
RAB Meeting	VHA should have a program to provide training for residents in providing childcare.	VHA appreciates this suggestion and will consider this and other issues around childcare for future initiatives.
RAB Meeting	The RAB is concerned about the recent staff reduction at the Community Center.	Unfortunately budget issues recently resulted in the elimination of one position at the Center. However, VHA does not anticipate any additional cuts.
Letter from CCRSN	Recommend that VHA add to the Plan making project-based vouchers available in County owned facilities.	Our current PBV program could be expanded into County properties without new MTW approvals. We are currently discussing this request.
Letter from CLS	Lack sufficient detail in the MTW Plan (example from last year’s Plan)	VHA respectfully disagrees. Specifically, the example given neglects to mention the fact that when concerns about the Campus of Learners lease addendum were expressed, VHA

**TABLE 9
SUMMARY OF PUBLIC COMMENTS ON THE VHA 2011 MTW ANNUAL PLAN**

SOURCE	COMMENT	VHA RESPONSE
		retracted the document and, after working with residents, submitted an entirely new lease for public comment that addressed many of their concerns.
Letter from CLS	Lack of evaluation and Impact analyses of the new initiatives	There is only one activity that is potentially a rent reform activity that would require an impact analysis. An analysis will be done when and if we do development of new Public Housing units using a minimum rent.
Letter from CLS	Lack of evaluation and impact analysis of previously approved initiatives	VHA respectfully disagrees and notes that the Annual Plan is not the format for such an analysis and that the commenter fails to consider that VHA is a relatively small agency without the resources that would be required for all of the types of evaluations the commenter requests.
Letter from CLS	The VHA promised to publish a “Dashboard” or other web-based report.	VHA earlier made a commitment to have a dashboard of performance measures live on our website. When this was done it was believed that the new housing software VHA had just purchased would be readily capable of producing such a dashboard. Unfortunately this is not the case and VHA is now finalizing an alternative dashboard concept that will be up before the end of the year.
Letter from CLS	Strengthen existing programs before embarking on new MTW initiatives	Almost all of the suggestions made for strengthening programs are actually underway or ongoing. A comprehensive evaluation of the Public Housing utility allowance is underway, Voucher payment standards are evaluated annually, and we recently reinvigorated the RAB with new membership. In addition VHA believes that this year’s proposed activities are quite moderate.
Letter from CLS	Before VHA proceeds with minimum rents and/or income limits for new public housing units we need assurance that all Public Housing units will be replaced.	VHA would like to give such an assurance but the realities of the current market do not allow for that. The proposed activity is intended to make replacement of Public Housing units more feasible and therefore possible.
Letter from CLS	If replacing Public Housing units is not possible without a minimum rent then we recommend that VHA use its MTW authority to project-base vouchers at the project.	VHA has received replacement vouchers for past dispositions and will apply for vouchers for any future ones. These vouchers may be project-based, but VHA will work to replace the Public Housing units as well.
Letter from CLS	If the above cannot be done then a minimum rent would be preferred over an income limit.	Noted.
Letter from CLS	The benchmark of 10 replacement units is too few.	We agree in that we are working to replace all disposed units. However the reality of the market and the timeline for new development results in a modest, but realistic, benchmark.

**TABLE 9
SUMMARY OF PUBLIC COMMENTS ON THE VHA 2011 MTW ANNUAL PLAN**

SOURCE	COMMENT	VHA RESPONSE
Letter from CLS	We want to remind VHA that this is a rent reform initiative and requires an impact analysis etc.	VHA is aware of this requirement and will prepare an impact analysis once this concept is further developed for a specific site at which time an analysis will be much more accurate.
Letter from CLS	The proposed new subsidy program outside of S8 & S9 lacks detail	As noted in the description, this activity will be further developed once approved in concept. Opportunities for additional comments will be provided.
Letter from CLS	It is premature for VHA to submit this in an Annual Plan	Perhaps, at this time we are presenting the information we have and will proceed as directed by HUD and our other advisors. The activity will likely reappear in more detail in a later Plan or amendment.
Letter from CLS	We support the proposal for “floating units” in Project-Based Voucher programs	VHA appreciates the support.
Letter from CLS	The proposal for up to 100% of units in a project to be project-based does not appear to promote any of the statutory objective of MTW	The activity supports the objective of increasing housing choices for low-income families by facilitating new housing development. Also the activity has been revised to 50%
Letter from CLS	The proposal contravenes the purpose behind the federal 25% limit.	VHA respectfully disagrees. Allowing VHA to project-base more than 25% in a building should allow for new housing opportunities outside of any potential concentration of poverty in our community
Letter from CLS	We are concerned that VHA may be tempted to overlook HQS in units owned by the agency	VHA respectfully disagrees. If anything we will likely be harder on our own property as it is in our self-interest to maintain them at a high standard. In addition VHA sees little difference in potential conflict of interest between having an employee perform an inspection versus a contractor.
Letter from CLS	We proposed that VHA waive the HQS requirement in properties where the condition of the unit is independently monitored by another agency.	This suggestion would result in far fewer actual inspections of units because other agencies only inspect a few representative units. This policy would likely result in more units falling below standard than the activity as proposed.
Letter from CLS	Lack of ongoing MTW activity descriptions	As noted in the first draft of the Plan the descriptions and updates for <i>ongoing</i> activities was provided later during the comment period.
Letter from CLS	No status updates	See previous comment.
Letter from CLS	No outside evaluations	VHA does not reject the idea of an outside evaluation of one or more activities, however we must weigh any potential benefit of such an evaluation against the cost, and in doing so, consider the limited resources of the agency.
Letter from CLS	We would support combining Public Housing and Section 8 Voucher waiting lists provided applicants could refuse a particular housing offer without losing their place on the waiting	VHA will take this comment under advisement as we assess any possible future merge of the waiting list.

**TABLE 9
SUMMARY OF PUBLIC COMMENTS ON THE VHA 2011 MTW ANNUAL PLAN**

SOURCE	COMMENT	VHA RESPONSE
	list.	
Letter from CLS	We do not support a local waiting list preference for DSHS clients at Skyline or Fruit valley. This would unfairly benefit some families at the expense of others.	This comment would be true of any waiting list preference. That is the nature of a preference or priority. In developing this preference we have weighed this against the benefit of being able to tie services to housing and increasing self-sufficiency for needy families.
Comment at hearing	I have a concern about the racial composition of referrals from DSHS.	VHA has no information that would cause us to have concerns about possible discrimination at the Washing State Department of Social and Health Services. Nevertheless we record race and other protected class of all applicants and should be able to measure any alleged discrimination in the future.
Comment at hearing	Why can't the VHA set the project-based cap at less than 100%?	VHA is asking to waive the 25% cap so we could go <i>up to</i> 100%. VHA did not plan to have a project at 100% (unless it was an elderly/disabled project with services as allowed under current regulation) but would like to be able to exceed the 100% cap. The activity has been revised to 50% due to public comment.
Comment at hearing	The VHA needs to have more specifics on the plan for minimum rent at replacement Public Housing units.	At this time VHA is asking for approval of the concept so we can move forward in planning new developments. Once a new project is identified, much more detail will be possible and available.

Neighbor to Neighbor

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

August 2010
Volume 10 Issue 6

Inside this Issue

- 2 VHA to implement non-smoking policies
- 2 Have you seen the hottest new show on TV?
- 2 Stop Smoking Now! Tobacco Quit Line
- 2 Take a Walk!
- 3 **FREE STUFF TO DO THIS SUMMER**
 - Movies
 - Summer Concerts
 - Outdoor Movies
 - Sunday Funday! at Marshall Community Center
 - Summer Lunch Program
- 4 RISE & STARS Community Center Happenings
- 4 Play & Learn

Vancouver Housing Authority
694-2501

RISE & STARS Community Center
737-2950

VHA Maintenance

Your Opinion Counts! Notice of Public Hearing on VHA's 2011 Moving to Work Plan

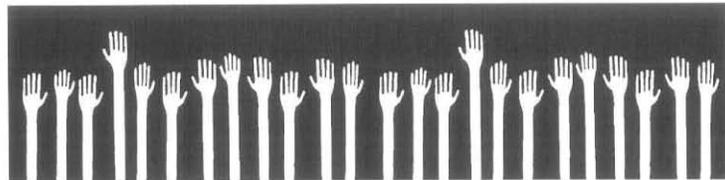
The VHA is requesting your comments on the 2011 Moving to Work Plan. New VHA policies being proposed in the Plan include the following:

- A new way of calculating rent and subsidy for any newly constructed Public Housing units.
- A new pilot housing program for up to 100 units
- Changes in the Project-based Voucher program that will allow VHA to have up to 100% of the units in a building in the program and for the subsidy to move from unit to unit.
- VHA to conduct their own inspections for Voucher program units in VHA owned buildings.
- A waiting list preference for certain DSHS WorkFirst participants for the Skyline and Fruit Valley waiting lists.

Beginning August 2nd, 2010, you can see a copy of the Plan on the VHA website at www.vhausea.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@vhausea.com.

To comment in person and to hear others, please come to the public hearing:
Thursday, September 2nd, 2010 at 6:00 pm
Vancouver Housing Authority, 2500 Main Street



RISE & STARS Community Center on Facebook

Check out our FaceBook page, "RISE & STARS Community Center"... it has the latest Community Center updates including previews of tomorrow's activities, reviews of yesterday's activities, and announcements about upcoming events at the Center. Our "notes" section has volunteer opportunities around Vancouver. Come connect to our neighborhood, join us on FaceBook!

Affidavit of Publication

STATE OF WASHINGTON)

) ss:

County of Clark)

Columbian

FRANK .
VANCO HOUSING AUTH/DEV DEPT-L
2500 MAIN ST
VANCOUVER WA 98660

REFERENCE: 71171
3077086 Notice of Public Hca

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: 08/02 08/03

TOTAL COST: 123.42
FILED ON: 08/03/10

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

Signature

Judy Moody

Notice of Public Hearing

The Vancouver Housing Authority (VHA) will hold a public hearing on its Moving to Work Annual Plan for 2011 on Thursday, September 2, 2010, 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 2009 Moving to Work Annual Plan will be available, beginning August 2, 2010, 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.vhause.com, in the "What's New" section.

Hearing Date: Thursday, September 2, 2010

Time: 6:00 p.m.

Location: Community Room of the VIA 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

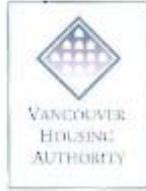
TDD: (360) 694-0842

www.vhause.com

Equal Housing Opportunity

Aug. 2, 3

374081



Please Sign In

Vancouver Housing Authority Public Hearing on the 2011 MTW Annual Plan

Thursday, September 2, 2010
2500 Main Street
Vancouver, WA 98660

	Name	Organization or Housing Program
1.	Cecilia Lyons	CFTI
2.	Amy McCullough	NIP
3.	Bridgette Feb	VHA
4.	Dominic Austin	VHA
5.	Lobsang Khayas	VMA
6.		
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16.		



August 27, 2010

VIA EMAIL AND FIRST CLASS MAIL

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

Re: Draft Moving to Work Annual Plan for Fiscal Year 2011

Dear Mr. Johnson:

INTRODUCTION

As you know, Columbia Legal Services and the Northwest Justice Project are private, nonprofit law firms that provide legal representation to low income households throughout the State of Washington. We represent Clark County residents, including Public Housing and Section 8 Voucher participants. We are writing on behalf of our clients to comment on the Vancouver Housing Authority's draft Moving to Work (MTW) Annual Plan for Fiscal Year 2011. We ask that you include these comments in the record of the public hearing scheduled for September 2, 2010. We also ask that you share these comments with your Board of Commissioners in advance of their September 22, 2010 meeting, so that they will have an opportunity to consider our concerns before acting on any request to approve the plan.

GENERAL COMMENTS

First, we appreciate that the proposed initiatives reflect VHA's commitment to expand affordable housing in our community. We nonetheless have a number of concerns regarding the initiatives as drafted. We are primarily concerned that VHA will fund these new MTW initiatives by program "savings" that have occurred because of its failure to adequately adjust its Section 8 Voucher payment standards and Public Housing utility allowances. To alleviate this concern, we are asking that VHA review and adjust its payment standards and utility allowances, as required by HUD regulations, before using any program savings or reserves to serve additional families off its wait lists. Additionally, we are concerned that the Plan does not demonstrate that the proposed additional housing will be affordable for our most vulnerable and needy community members. Our specific concerns regarding each of the initiatives will be discussed in more detail below.



Roy Johnson
Comments on Annual MTW Plan FY 2011
August 27, 2010
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In addition, our general concerns pertaining to all the proposed initiatives are: 1) the MTW 2011 Plan does not describe the initiatives in enough detail that VHA's residents and community stakeholders can adequately comment on them; 2) VHA has not demonstrated that the initiatives align with Clark County's Ten Year Plan to End Homelessness and will not harm low-income families in our community; 3) VHA has not yet evaluated or demonstrated the success of the numerous initiatives—approximately twenty-- it has implemented in recent years; 4) VHA has yet to regularly publish, through a "dashboard" or other web based reporting mechanism, information on how its various initiatives have impacted those it serves; and (5) VHA's staff and resources would be better spent on strengthening its existing programs before embarking on new MTW initiatives.

1. Lack of Sufficient Detail in MTW Plan

VHA is required to seek input from residents and the community at large before its Board may approve its proposed MTW initiatives. By not giving sufficient details of its initiatives, VHA is depriving its residents and the community of necessary information to make an informed decision whether to support or oppose the initiatives.

A good illustration of the need for full transparency during the public process is VHA's 2009 initiative to create a "Campus of Learners" at its Skyline Crest project. The 2009 plan provided little to no details of the new lease that Skyline Crest residents would be required to sign, but did state that those residents would have an opportunity to "opt-out" of the proposed initiative. It was only after the initiative was approved that a lease was distributed to tenants; and only then did tenants learn that the "opt-out" clause was not a true opt-out clause (that is, the lease made clear that tenants who chose not to participate in the Campus of Learners initiative would lose their housing); that the lease contained other overly burdensome provisions; and that tenants had not been given their regulatory right to review and comment on the lease prior to its implementation.

Attachment B of VHA's current MTW Agreement requires that the agency provide an update on the status of each of its ongoing MTW activities. In its haste to publish its draft Annual MTW Plan, VHA failed to provide these updates, indicating instead that "[a] status update will be provided in a later draft of the Plan." By omitting required elements of the available plan, VHA has deprived residents and the public of an opportunity to meaningfully comment on the plan and its implementation of ongoing MTW activities, as required by its MTW Agreement.

2. Lack of Evaluation and Impact Analyses of the New Initiatives

VHA is obligated to consider the potential impact of its MTW initiatives on its residents, wait list applicants and community. In particular, as part of its duty to affirmatively further fair

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housing pursuant to the federal Fair Housing Act, VHA is obligated to consider the potential discriminatory or segregation impact of its initiatives. Noticeably absent in VHA's 2011 plan is any discussion of such an analysis or commitment to conduct such an analysis if its initiatives are implemented. VHA should re-publish its plan with this information included.

3. Lack of Evaluation and Impact Analyses of Previously Approved Initiatives

As we have noted in the past, VHA has not designed its various MTW initiatives in a manner that can be effectively evaluated, and has chosen not to use independent evaluators to assess the results of these initiatives. In fact, its draft MTW Plan for FY 2011 makes it clear that VHA has chosen not to undertake any evaluation beyond providing HUD with the reports required by its MTW Agreement.

HUD has recently recognized that there is a need to rigorously test the effects of alternate rent strategies and that the only meaningful way of doing this is through a random assignment process for participants to treatment and control groups to address research standards. See, Notice PIH 2010-29 (IIA) Issued July 30, 2010 Request for Application under the Moving to Work Demonstration Program. We urge VHA to reconsider its approach and, in the forthcoming year, to commit to undertaking a comprehensive, independent assessment of the impact that its participation in the HUD MTW Demonstration has had on its Public Housing tenants, Section 8 Voucher participants, wait list applicants, and the community at large. VHA should involve the households it serves and the community at large in this evaluation.

Some of the questions the assessment should address are:

1. Has VHA's participation in the program resulted in more or fewer federal housing dollars going to Clark County?
2. Has VHA served more or fewer Section 8 Voucher participants than it would have had it not elected to participate in the program?
3. What has the impact been on the rent burdens of Public Housing and Section 8 Voucher participants?
4. Has VHA's decisions concerning payment standards, utility allowances and other policies increased or decreased the range of housing available to participants?
5. Has VHA's MTW initiatives achieved the MTW statutory objectives and at what cost?
6. What has been the impact of the program on furthering Fair Housing?

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At a minimum, VHA should not embark on any new MTW initiatives unless (1) it is prepared to design and implement the new MTW initiatives in a way that they can be evaluated; and (2) it is able and willing to retain an independent evaluation of the initiative.

4. Dashboard

In 2008, VHA promised to regularly publish program information, using a “dashboard” or other web-based reporting mechanism. We are still waiting for the agency to make such information available. We are asking that VHA make a commitment in its Annual MTW Plan for FY 2011 to provide this information within the first three to six months of the upcoming year.

5. Strengthen Existing Programs Before Embarking on New MTW Initiatives.

There a lot of ways that VHA could improve its Public Housing and Section 8 Voucher programs, without embarking upon new MTW initiatives. First, it could complete its current review of Public Housing utility allowances and provide refunds to those tenants who were excessively rent burdened because past allowances were not annually adjusted. Second, it could take steps now to review the adequacy of its Section 8 Voucher payment standards in light of the proposed Fair Market Rents published for FY 2011. *See*, 75 Fed. Reg. 46958 (August 4, 2010). If as expected, these Fair Market Rents take effect October 1, 2010, VHA’s payment standards will fall below 90% of the published FMR’s in violation of the Housing Act and HUD’s implementing regulations, leaving its Section 8 Voucher participants significantly rent overburdened. Third, it could strengthen its Resident Advisory Board so that they are an independent, resident controlled organization. Fourth, it could take steps to ensure that its MTW Advisory Committee is given an opportunity to evaluate the agency’s performance through the Annual MTW Report process.

SECTION V - PROPOSED MTW INITIATIVES: HUD APPROVAL SOUGHT

1. Activity 2011-01: Minimum Rent and/or Income Limits for New Public Housing Units

According to the agency’s current MTW Agreement with HUD and Attachment A pertaining to the calculation of subsidies, its public housing operating subsidy will continue in accordance with applicable operating subsidy formula law and regulations. Given this provision, we do not understand why VHA must move away from an income-based, public housing rent calculation to finance replacement public housing units. Before VHA proceeds with this initiative, we need further assurances that it will in fact replace all the public housing units it disposes of with hard units that will be affordable to our lowest income residents.

To the extent that VHA can demonstrate that it cannot proceed with replacing these Public Housing units without taking steps to ensure that they will collect a minimum rental stream from the family because their public housing operating subsidy from HUD is inadequate,

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we recommend that VHA achieve this by using its MTW authority to project base Vouchers at the project, which appears to be an approach that HUD is now proposing through its PETRA initiative.

If this cannot be done, we prefer to see VHA address the problem by creating a higher, project specific minimum rent, rather than imposing a minimum income requirement as part of its admission policy for these units. We are concerned that a minimum income requirement will screen out families who are able and willing to pay a higher percentage of their income to secure, safe, decent housing (and are in the best position to make this decision). In our view, a minimum income requirement is at odds with the income targeting commitment of the agency.¹ This requirement may also have adverse fair housing consequences, screening out minority households and families with children.

According to VHA's Draft MTW Plan, the agency has already disposed of 21 single family units and hopes to sell another 38 by the end of 2011. Despite its expectation that it will have sold 59 of these units by the end of 2011, it is only proposing a benchmark of replacing ten (10) new units within two years. In our view, this benchmark is not consistent with the representations VHA made when it first proposed to dispose of these units. We were told then that VHA would apply for tenant protection vouchers for tenants occupying the units and create replacement public housing units in mixed income housing projects.

Lastly, we want to remind VHA that any change in how it calculates public housing rents is considered a "rent reform" initiative that requires a rent impact analysis, and annual re-evaluation of the initiative, hardship case criteria, and documentation that the agency has held a public hearing, given residents and the public an opportunity to review and comment on the initiative, and considered the comments before its Board approves the policy. At the present time, we do not believe that VHA has provided sufficient detail as to how it will proceed or undertaken the necessary analysis required to implement this initiative.

2. Activity 2011-2: New Tenant Based Subsidy Program Outside of Section 8 and 9

We agree that there is a large need for more affordable housing in our community. We believe, however, that any proposed housing should further the objectives of Clark County's Ten Year Plan to End Homelessness or create housing for the most needy of our community.

¹ In the early years of the MTW Program, the VHA Board of Commissioners at our suggestion and the recommendation of staff agreed that they would follow the Section 8 Voucher income targeting requirements in their Public Housing program. In other words, they agreed that at least 75% of the households moving into its Public Housing units would be extremely low-income (ELI) with incomes at or below 30% of area median income. I recently noticed that this policy is not reflected in the agency's Admission and Continued Occupancy Policy (ACOP) posted on its website which reflects the minimum statutory and regulatory income targeting requirements. If VHA abandoned its decision to target more of its Public Housing units to ELI households than required by federal law, it should have done so through its Annual MTW planning process to insure that residents and the public had notice and an opportunity to comment on this change in policy. If not, VHA should reinstate the policy and amend its ACOP accordingly until it goes through this process.

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Unfortunately, VHA's description of the program is nothing more than a placeholder, providing few salient details. VHA makes it clear that it plans to use an alternative rent calculation, that these vouchers will likely be term limited, and will be targeted to specific populations. It does not, however, provide any details on how the rent subsidy will be calculated, what the terms will look like, or who will actually be served. This prevents residents and the community at large from meaningfully commenting on the proposal.

In any case, we believe it is premature for VHA to include this proposal in its Annual MTW Plan for FY 2011, as it does not have authority under its current MTW Agreement to use MTW funds to implement activities that fall outside of Section 8 and 9, even though they might allow the agency to serve additional households. In accordance with Assistant Secretary, Sandra B. Henriquez's October 1, 2009 letter re Broader Uses of Funds Authority for All MTW Agencies, VHA must first submit a proposal to the Office of Public Housing Investments. Once HUD approves the proposal, VHA will have to negotiate an amendment of its MTW Agreement, which can only be entered into after it has complied with the public hearing requirements set forth in Section V.A. of its MTW Agreement. Only after this is done will VHA be in a position to include such a proposal in its plan.

Before submitting a proposal to HUD, we urge the Board to keep in mind that VHA will only be allowed to use Section 8 and 9 funds for uses outside of Sections 8 and 9 during the term of its MTW Agreement. Furthermore, should Congress implement future legislation that alters the MTW demonstration, the use of this authority may be impacted. As a result, VHA should not embark upon any MTW initiative that it cannot transition out of without adversely impacting program beneficiaries.

3. Activity 2011-03: Allow "Floating Units" in Project-Based Voucher Programs

We support this proposal. We support VHA's decision to project-base a reasonable number of its Vouchers as a means of securing supportive services for special needs populations, and see no reason why such units should not "float" so that families can remain in their units or transition in place when they no longer need such services.

4. Activity 2011-04: Allow Up to 100% of Units in a Project to be Project-Based

On the other hand, we do not support this proposal as drafted. We do not believe this a reasonable use of VHA's MTW authority as it does not appear to promote any of the statutory objectives of the MTW Demonstration Program. Moreover, we are concerned that the initiative contravenes the purpose behind the federal 25% limitation, which is to avoid concentration of poverty and possible segregation of disabled families. VHA has not demonstrated that it considered this potential outcome or adopted safeguards against such an outcome.

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5. Activity 2011-05: VHA Staff to Perform Inspections & Rent Reasonableness on Its Own Properties

We are concerned that VHA inspectors may be tempted to overlook Section 8 Housing Quality Standards in units owned by the agency; and that should this occur, it would not only impact the household residing in such housing but could undermine the credibility of VHA and its housing programs. We are not convinced that the projected cost savings are sufficient to take on this risk.

In lieu of this policy proposal, we recommend that VHA use its MTW authority to waive any IQS inspection requirement, where the condition of the unit is already independently monitored by another agency such as the Washington State Housing Finance Commission. Second, tenants of these units should be advised in writing of their repair rights under Washington law and be informed of the availability of free legal representation through the Northwest Justice Project CLEAR Hotline. Third, a random sample of all such units should be annually inspected to test whether such an initiative adequately protects tenants.

SECTION VI. ONGOING MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

1. Lack of Ongoing MTW Activity Descriptions.

This section of the Annual MTW Plan for FY 2011 should be rewritten to add a description of each activity so that readers of the plan can grasp what the activity entails without having to review previous plans. This is particularly important for those activities that VHA has chosen to rename in the present MTW plan, rather than using the title or description it used in previous plans.

2. No Status Updates.

As explained previously, by omitting required elements of the available plan, VHA has deprived residents and the public of an opportunity to meaningfully comment on the plan and its implementation of ongoing MTW activities, as required by its MTW Agreement.

3. No Outside Evaluations.

As noted above, we find it disconcerting that VHA has decided not to obtain independent evaluations of any of its initiatives. This is of particular concern given that Section VIII B. of the Plan makes clear that VHA also has no plans to do its own evaluations of these initiatives, but instead will rely solely on the required elements in its Annual MTW Plan and Report to evaluate its activities.

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MERGER OF NON SITE-BASED PUBLIC HOUSING AND VOUCHER WAITING LISTS; NEW PREFERENCE AT SKYLINE AND FRUIT VALLEY.

Although not an MTW initiative, VHA has indicated that it plans to explore the possibility of combining the waiting list for Housing Choice Vouchers and the general non site-based Public Housing list. It also is planning to adopt a new local preference for the site-based lists for Skyline Crest and Fruit Valley. We support combining the non-site based Public Housing and Section 8 Voucher waiting lists, provided applicants have the right to refuse a particular housing offer without losing their place on the waiting list. Attachment C to VIIA's MTW Agreement makes it clear that it must provide applicants with a reasonable choice of location in accordance with Title VI of the Civil Rights Act the Fair Housing Act, and other applicable civil rights requirements.

We do not support the creation of an admission preference that would permit DSHS to determine who gets an admission preference at Skyline or Fruit Valley. This would unfairly benefit some families, at the expense of others. If VHA truly wants to test this concept further, it should randomly assign those referred by DSHS to a control and treatment group and follow the families to see whether there is any measurable difference between motivated families who receive housing assistance and those who do not.

CONCLUSION

In conclusion, we ask that VHA address our concerns, analyze the potential impact of each of its initiatives, and re-publish the proposed MTW 2011 Annual Plan with more details about each of its initiatives. We also ask that VHA reconsider its decision to annually embark upon new MTW initiatives. Instead, VHA should focus its efforts on strengthening its current Public Housing and Section 8 Voucher programs.

We would also like to see VIIA take steps to strengthen its Resident Advisory Board and involve both the RAB and MTW Advisory Committee in the annual MTW report process and in implementation of a "dashboard" or other web based reporting mechanism. If you have any questions or would like to discuss these comments further, please do not hesitate to contact us.

Sincerely,

Columbia Legal Services



Gregory D. Provenzano
Attorney at Law

Northwest Justice Project

Amy McCullough
Attorney at Law



proud past, promising future

CLARK COUNTY
WASHINGTON

COMMUNITY SERVICES

September 2, 2010

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

RE: Support for 2011 Move to Work Plan

Dear Mr. Johnson:

On behalf of the Clark County Regional Support Network (CCRSN), I am writing in support of the Vancouver Housing Authority's 2011 Annual Moving to Work Plan. CCRSN is supportive of the Vancouver Housing Authority's (VHA) innovative and creative strategies to increase self sufficiency for individuals residing in housing. The VHA has been a valuable resource for low-income individuals in Clark County particularly individuals who have mental illness or co-occurring mental illness and substance abuse problems.

The VHA has collaborated with our treatment providers on multiple housing projects as well as contributed information to resource books that were distributed to clinical staff in our community. The CCRSN recommends that the VHA include Project Based Section 8 for county owned facilities in their plan. Housing support is a critical element in assisting individuals to become self-sufficient in addition to the behavioral health services they receive within the CCRSN funded service delivery system.

Sincerely,

Connie Mom-Chhing
RSN Administrator

mjp

cc: Pete Munroe, Housing Manager
Melodie Pazolt, Consumer & Stakeholder Affairs

1601 E Fourth Plain Blvd Bldg 17 Rm C214 PO Box 5000 Vancouver WA 98666 5000 tel: [360] 397 2130 fax: [360] 397 6028



APPENDIX C. ADVISORY COMMITTEES

Resident Advisory Board

Sandra Brown	Public Housing Resident
Claudia Carter	Housing Choice Voucher Participant
Dana DePriest	Housing Choice Voucher Participant
Julie Ensign	Public Housing Resident
Chris Pazen	Public Housing Resident
Billie Reed	Housing Choice Voucher Participant
Trisha Rice	Housing Choice Voucher Participant

Moving to Work Advisory Committee

Jordana Barkley	SW Washington Workforce Development Council
Pam Brokaw	SW Washington Partners in Careers
Debby Dover	Second Step Housing
Teri Duffy	Community Housing Resource Center
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

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 Crest	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

2015

<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 Crest	Siding Replacement	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 Housing Choice Voucher program. 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

Special Applications Center (SAC) The department at HUD that reviews and approves applications for demolition, disposition, conversion, and other changes proposed for Public Housing.

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.

Total Tenant Payment (TTP) 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.